I/3078697/2023

BY EMAIL/DoT Website

Government of India
Ministry of Communications
Department of Telecommunications
Sanchar Bhawan, 20, Ashoka Road, New Delhi - 110 001
(Data Services Cell)

No. 813-07/LM-18/2020-DS-II **Dated:10-01-2023**

To,

All Internet Service Licensee's

Subject: CS Comm No. 471 of 2020; titled as PB Fintech Pvt Ltd V/s Policy Bazar Finance & ORS., before Hon'ble Delhi High Court.

In continuation to Department of Telecommunications (DoT) even no. letters dated 27.11.2020, 07.04.2021 & 29.09.2022; kindly find the enclosed herewith Hon'ble Delhi High court order dated 20th December 2022 for compliance in respect of **6' websites** of defendant nos. 43 to 47 in the subject matter case C.S.(Comm) No. 471 of 2020. DoT is respondent No. 14 in the case.

2. Hon'ble Court vide order dated 20th December, 2022 has, inter alia, directed that:

7 . For the foregoing reasons, in light of previous orders passed in similar applications and in order to curb any malpractices or any financial loss to the public, following directions are passed:

i) Proposed Defendants No. 43 to 47 are impleaded as Defendants. Amended memo of parties, annexed with I.A. 21805/2022, is taken on record.

vi) Defendants No. 14 [DoT] and 15 [MEITY] shall issue directions to all ISPs and telecom service provides directing them to block access to the websites hosted by Defendants No. 43 to 47 on the impugned domain names/ websites.

3. Accordingly, in view of the above, all the Internet Service licensees are hereby notified to take immediate necessary blocking action for compliance of the court order dated 20.12.2022 with respect to '**6' websites** of defendant nos. 43 to 47 as listed in **para 4** of the said court order.

Signed by Subodh Saxena
Date: 10-01-2023 11:38:00
Director (DS-II)
Tel: 011-2303 6860
Email: dirds2-dot@nic.in

Encl: A/A
Copy to:

i. Sh. V.Chinnasamy, Scientist E (chinnasamy.v@meity.gov.in), Electronics Niketan, Ministry of Electronics and Information Technology (MeitY) New Delhi (Respondent no. 15) for kind information and necessary action.
ii. Lawyer/Advocate for the plaintiff.
iii. DoT website.

$~23

* **IN THE HIGH COURT OF DELHI AT NEW DELHI**

\+ CS(COMM) 471/2020

PB FINTECH LIMITED ..... Plaintiff

Through: Mr. Kapil Wadhwa and Ms. Surya Rajappan, Advocates.

versus

POLICY BAZAR FINANCE & ORS. ..... Defendants

Through: Ms. Sweta Sahu, Advocate for D-9/ GoDaddy.com LLC.

CORAM:
HON'BLE MR. JUSTICE SANJEEV NARULA

O R D E R

% 20.12.2022

I.A. 21805/2022 (*seeking impleadment of Defendants No. 43 to 47 to the array of parties)* **and**
I.A. 21816/2022 (*seeking interim injunction against Defendants No. 43 to 47 and directions against Defendants No. 9, 10 & 14 – 15)*

1. Although I.A. 21805/2022 has been deleted from the cause list and is stated to be listed today before the Joint Registrar (Judicial), perhaps because as per Rule 3 in Chapter II of the Delhi High Court (Original Side) Rules, 2018 [dealing with 'Powers of the Registrar'], such an application is listed before the said court, however, since the said application is interlinked with I.A. 21816/2022 (seeking interim directions), at the request of Mr. Kapil Wadhwa, counsel for Plaintiff, both the above applications are taken up by this Court today itself.

2. *Vide* order dated 11th November, 2020, an *ad-interim ex-parte* injunction was granted in favour of the Plaintiff and against Defendants No. 1 to 8 (and their agents and persons acting on their behalf) from using the trademarks/ logos 'POLICYBAZAAR' and 'PAISABAZAAR' or any other deceptively similar mark(s) or logo(s) including respective domain names administered by them. Further, the concerned Domain Name Registrars [hereinafter "*DNRs*"] – Defendants No. 9 to 13 were directed to block/ suspend the websites of Defendants No. 1 to 8, which were registered with them; Defendants No. 14 and 15 were directed to issue directions to various internet service providers [hereinafter "*ISPs*"] and telecom service providers to block access to infringing domain names of Defendants No. 1 to 8. In terms of para No. 5 of the said order, Plaintiff was further granted liberty to approach this Court to array other rogue website(s) carrying on similar activities, as-and-when detected.

3. Subsequently, from time-to-time, on similar applications, Defendants No. 18 to 42 have been impleaded and interim injunction has been extended to them.

4. By way of I.A. 21805/2022, Plaintiff seeks impleadment of Defendants No. 43 to 47 and consequently, *vide* I.A. 21816/2022, an interim injunction against such proposed Defendants as well as direction *qua* suspension of impugned domains/ website, etc. is prayed for. Details of Domain Registrars *vis-à-vis* impugned domains belonging to Defendants No. 43 to 47, given in the said application, is culled out below:

S. No.	Registrant	Impugned Domain/ Webpage Name	Domain Registrars
1.	Defendant No. 43	pbazaar.in; policy.pbazaar.in	Defendant No. 9 (GoDaddy.com, LLC)
2.	Defendant No. 44	policybazaarlinkpay.in	Defendant No. 10 (Endurance Digital Domain Technology LLP)
3.	Defendant No. 45	salepolicybazaar.com	Defendant No. 9 (GoDaddy.com, LLC)
4.	Defendant No. 46	policybazaarpayment.co.in	Defendant No. 9 (GoDaddy.com, LLC)
5.	Defendant No. 47	policybazaar.payments.in	Defendant No. 10 (Endurance Digital Domain Technology LLP)

5. Mr. Wadhwa submits that proposed Defendants No. 43 to 47 are infringing Plaintiff's right in well-known trademarks – 'POLICYBAZAAR' and 'PAISABAZAAR', with an intent to ride upon Plaintiff's goodwill and elicit commercial gains thereon. The *modus operandi* adopted by proposed Defendants has been set out in the application. Snapshots of the websites of proposed Defendants are annexed along with the application (I.A. 21816/2022) demonstrating that Plaintiff's website has been wholly impersonated by them. The proposed Defendants, by using Plaintiff's trademark *sans* authorization, are deceiving innocent customers by inducing them to transact on the said websites under a mistaken belief that they are transacting with the Plaintiff.

6. The Court has perused the screenshots annexed along with I.A. 21816/2022. The same demonstrates use of Plaintiff's trademarks by proposed Defendants No. 43 to 47, whereby they are attempting to not

merely infringe and pass off, but instead are impersonating Plaintiff itself. Moreover, apart from the rights of Plaintiff, which are being infringed, it would also not be in public interest to permit websites/ domain names, run by proposed Defendants No. 43 to 47, to continue. In view of the above, Plaintiff has made out a *prima facie* case in its favour for grant of *ex-parte ad-interim* injunction and balance of convenience also lies in favour of the Plaintiff. Irreparable loss would be caused to the Plaintiff, if an *ex-parte* injunction is not passed. The loss to the public is also incalculable.

7. For the foregoing reasons, in light of previous orders passed in similar applications and in order to curb any malpractices or any financial loss to the public, following directions are passed:

(i) Proposed Defendants No. 43 to 47 are impleaded as Defendants. Amended memo of parties, annexed with I.A. 21805/2022, is taken on record.

(ii) Defendants No. 43 to 47, their agents or any other persons acting for or on their behalf are restrained from using trademark/ logo 'POLICYBAZAAR' and 'PAISABAZAAR', or any other mark(s)/ logo(s) which are deceptively similar to the aforementioned marks either as part of the domain name/ UPI ID/ E-mail ID or as trademark, service mark or trading style/ corporate name, in relation to any goods or services which would result in passing off or infringement of Plaintiff's trademark, mentioned above.

(iii) Defendants No. 9 and 10 are directed to immediately block/ suspend the domain names, as well as the websites as mentioned in the table in para No. 3 of this order, if are hosted/ registered *via* their platforms.

Status quo shall also be maintained in respect of the said domain names and the same shall be locked with immediate effect. Defendants No. 9 and 10 are restrained from transferring the said domain names or creating any third-party interest on the same, until further orders.

(iv) Defendants No. 9 and 10 are directed to disclose to counsel for Plaintiff and file an affidavit before this Court disclosing complete contact details of the registrants or persons who have registered the abovementioned domain names (in para No. 3 of this order) along with their postal address, e-mail addresses, bank account details, and telephone numbers, etc. Let the said affidavit be filed within one week from the receipt of the copy of this order. Upon receipt of this order, Defendants No. 9 and 10 shall immediately communicate contents of this order, to the registrants of the infringing domain names. In case Plaintiff comes across any other domain names or websites infringing Plaintiff's registered marks/ logos, they are permitted to approach the Court with an application for appropriate reliefs.

(v) Registrants of the infringing domain names (provided in para No. 3 of the said order), shall cease all use of the domain names and pull down the websites hosted on the said domain names with immediate effect.

(vi) Defendants No. 14 [DoT] and 15 [MEITY] shall issue directions to all ISPs and telecom service provides directing them to block access to the websites hosted by Defendants No. 43 to 47 on the impugned domain names/ websites.

8. Let compliance in terms of Order XXXIX Rule 3 of CPC be done

with one week from today.

9. Accordingly, I.A. 21805/2022 is disposed of; let summons in the suit be served on newly impleaded Defendants No. 43 to 47, by all permissible modes, upon filing of process fee, returnable on the next date of hearing.

10. Issue notice in I.A. 21816/2022. Ms. Sweta Sahu, Advocate, accepts notice on behalf of Defendant No. 9. Reply, if any, be filed within four weeks from today. Rejoinder thereto, if necessary, be filed within two weeks thereafter. Notice be issued to newly impleaded Defendants No. 43 to 47, by all permissible modes, on filing of process fee, returnable on the next date of hearing.

11. *Dasti*.

SANJEEV NARULA, J

DECEMBER 20, 2022
nk

IN THE HIGH COURT OF DELHI AT NEW DELHI
(Ordinary Original Civil Jurisdiction)
I.A. NO.___OF 2022
IN
CS (COMM) NO. 471 OF 2020
CODE No. 36017

IN THE MATTER OF:
PB FINTECH LIMITED ...PLAINTIFF

VERSUS

POLICY BAZAR FINANCE & ORS. ...DEFENDANTS

NDOH: 24.01.2023

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KAPIL WADHWA, SURYA RAJAPPAN
& VASANTHI HARIHARAN
WADHWA LAW CHAMBERS
Advocates for the Plaintiff
DD-13 Kalkaji, LGF
New Delhi 110019
Mob: 9891929028
Email: kapil@wadhwachambers.com

Place: New Delhi.
Dated: 17.12.2022

Note:
1. All parties to the present application have been served via email. Affidavit of service with proof of service is attached at Pg. 58 - 60.
2. The documents filed along with the Application are pertinent to the Application and are hence being filed in the same Index.

IN THE HIGH COURT OF DELHI AT NEW DELHI
(Ordinary Original Civil Jurisdiction)
I.A. NO.____OF 2022
IN
CS (COMM) NO. 471 OF 2020
CODE No. 36017

IN THE MATTER OF:
PB FINTECH LIMITED ...PLAINTIFF

VERSUS

POLICY BAZAR FINANCE & ORS. ...DEFENDANTS

COURT FEES

:: Court Fee Receipt Details

Litigant Name	PB FINTECH LIMITED
Location Name	NCT OF DELHI
Account Reference	VASANTHI HARIHARAN
Court Fee UIN	DLCT1728L2242M995
Court Fee Amount	60

Print Receipt

IN THE HIGH COURT OF DELHI AT NEW DELHI
(Ordinary Original Civil Jurisdiction)
I.A. NO.____OF 2022
IN
CS (COMM) NO. 471 OF 2020
CODE No. 36017

IN THE MATTER OF:
PB FINTECH LIMITED ...PLAINTIFF

VERSUS

POLICY BAZAR FINANCE & ORS. ...DEFENDANTS

URGENT APPLICATION

To,
The Registrar
High Court of Delhi
New Delhi

Sir,

You are requested to kindly treat the accompanying Application as an urgent one in accordance with the rules of the Hon'ble High Court of Delhi for the reasons prayed for in the accompanying Application.

Yours Sincerely,

KAPIL WADHWA, SURYA RAJAPPAN
& VASANTHI HARIHARAN
WADHWA LAW CHAMBERS
Advocates for the Plaintiff
DD-13 Kalkaji, LGF
New Delhi 110019
Mob: 9891929028
Email: kapil@wadhwachambers.com

Place: New Delhi.
Dated: 17.12.2022

IN THE HIGH COURT OF DELHI AT NEW DELHI
(Ordinary Original Civil Jurisdiction)
I.A. NO.____OF 2021
IN
CS (COMM) NO. 471 OF 2020
CODE No. 36017

IN THE MATTER OF:
PB FINTECH LIMITED ...PLAINTIFF

VERSUS

POLICY BAZAR FINANCE & ORS. ...DEFENDANTS

NOTICE OF MOTION

Sir/ Ma'am,

Kindly take note that the accompanying Application is being filed before the Hon'ble High Court of Delhi and the same is likely to be listed on 20.12.2022 or thereafter.

Yours sincerely,

KAPIL WADHWA, SURYA RAJAPPAN
& VASANTHI HARIHARAN
WADHWA LAW CHAMBERS
Advocates for the Plaintiff
DD-13 Kalkaji, LGF
New Delhi 110019
Mob: 9891929028
Email: kapil@wadhwachambers.com

Place: New Delhi.
Dated: 17.12.2022

IN THE HIGH COURT OF DELHI AT NEW DELHI
(Ordinary Original Civil Jurisdiction)
I.A. NO.____OF 2022
IN
CS (COMM) NO. 471 OF 2020
CODE No. 36017

IN THE MATTER OF:
PB FINTECH LIMITED ...PLAINTIFF

VERSUS

POLICY BAZAR FINANCE & ORS. ...DEFENDANTS

APPLICATION UNDER ORDER I RULE 10(2) READ WITH SECTION 151 OF THE CODE OF CIVIL PROCEDURE, 1908 SEEKING IMPLEADMENT OF DEFENDANTS NO. 43 TO 47 TO THE ARRAY OF PARTIES

The Plaintiff, above-named, most respectfully submits:

1. The present suit has been instituted by the Plaintiff seeking permanent injunction restraining infringement, passing off, damages etc. by several rogue third-party websites hosted on identical/deceptively similar domain names violating Plaintiff's rights in its well-known trademarks POLICYBAZAAR and PAISABAZAAR.
2. That vide order dated 11.11.2020, this Hon'ble Court was pleased to grant an *ad-interim ex-parte* injunction, whereby Defendant Nos. 1 to 8, their agents, employees, partners and associates were restrained from using the trademark/logo "POLICYBAZAAR" and "PAISABAZAAR" or any other deceptively similar mark or logo thereto including their respective domain names administered by Defendant Nos. 1 to 8; Defendants No. 9 to 13 were directed to block/suspend the websites of Defendants No. 1 to 8 registered with them; Defendants No. 14 and 15 were directed to issue notifications to various internet service providers

and telecom service providers to block access to the infringing domain names of Defendants No. 1 to 8; and the Plaintiff was further granted liberty to approach this Court to array other rogue website(s) carrying on similar activities, as and when detected. Subsequently, Defendants No. 18 – 42 were impleaded, and appropriate orders were passed against the said Defendants.

3. It is submitted that vide the present application, the Plaintiff seeks to implead further rogue websites/parties, violating the Plaintiff's rights in its well-known trademarks POLICYBAZAAR and PAISABAZAAR with an intent to ride upon the Plaintiff's goodwill for illicit commercial gains. The details of the parties sought to impleaded by the Plaintiff is provided in the succeeding paragraphs. For a holistic view, a table depicting the "impugned domain/webpage names" with their corresponding Domain Name Registrars against whom injunction/direction is sought is as below:

S. No.	Registrant	Impugned Domain/ Webpage Name	Domain Registrars
1.	Defendant No. 43	pbazaar.in; policy.pbazaar.in	Defendant No. 9 (GoDaddy.com, LLC)
2.	Defendant No. 44	policybazaarlinkpay.in	Defendant No. 10 (Endurance Digital Domain Technology LLP)
3.	Defendant No. 45	salepolicybazaar.com	Defendant No. 9 (GoDaddy.com, LLC)
4.	Defendant No. 46	policybazaarpayment.co.in	Defendant No. 9 (GoDaddy.com, LLC)
5.	Defendant	policybazaar.payments.in	Defendant No. 10

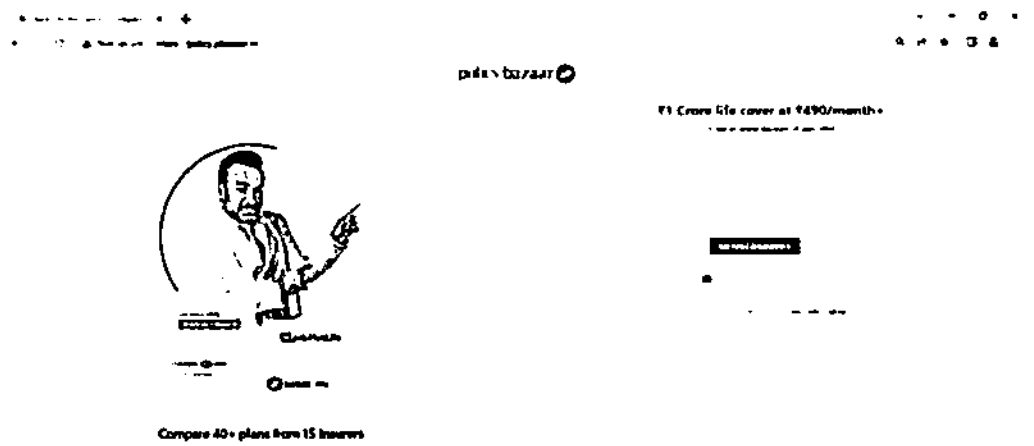
	No. 47		(Endurance Digital Domain Technology LLP)

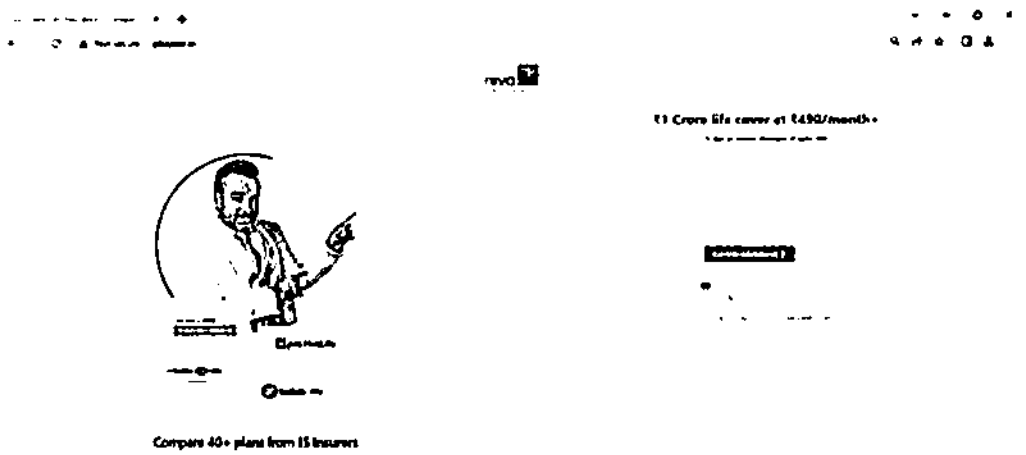
DEFENDANT NO. 43

4. The Defendant No. 43 is the Registrant of the domain name "pbazaar.in" ("*impugned domain no. 28*") and the webpage hosted thereon, "policy.pbazaar.in" ("*impugned domain/webpage no. 29*"). The said Defendant on 04.05.2020 obtained registration of the impugned domain name, "pbazaar.in" which is identical/ deceptively similar to the Plaintiff's well-known trademarks POLICYBAZAAR/PAISABAZAAR and domain names Policybazaar.Com/Paisabazaar.Com. The said domain is registered in the name of one "Promotion Bazaar", however the contact and address details of the said Defendant No. 43 have been concealed and redacted and as such the said Defendant cannot be identified by the Plaintiff. The Plaintiff is unaware of when the impugned webpage was added as an extension to the domain name "pbazaar.in" by the said Defendant. The impugned domain name has been registered with Defendant No. 9, i.e., GoDaddy.com, LLC. Copy of the Whois details of the said impugned domain name "pbazaar.in" is being filed along with the present Application as **Document – 1**.

5. It is submitted that Defendant No. 43 is also making an infringing and unauthorised use of the Plaintiff's trademarks POLICYBAZAAR, policybazaar, policybazaar, etc., on its webpage hosted on the impugned domain name, "pbazaar.in". Further, the said Defendant is also misrepresenting itself as the Plaintiff by using the registered address and registration number of the Plaintiff on both the impugned domain name as well as the impugned webpage.

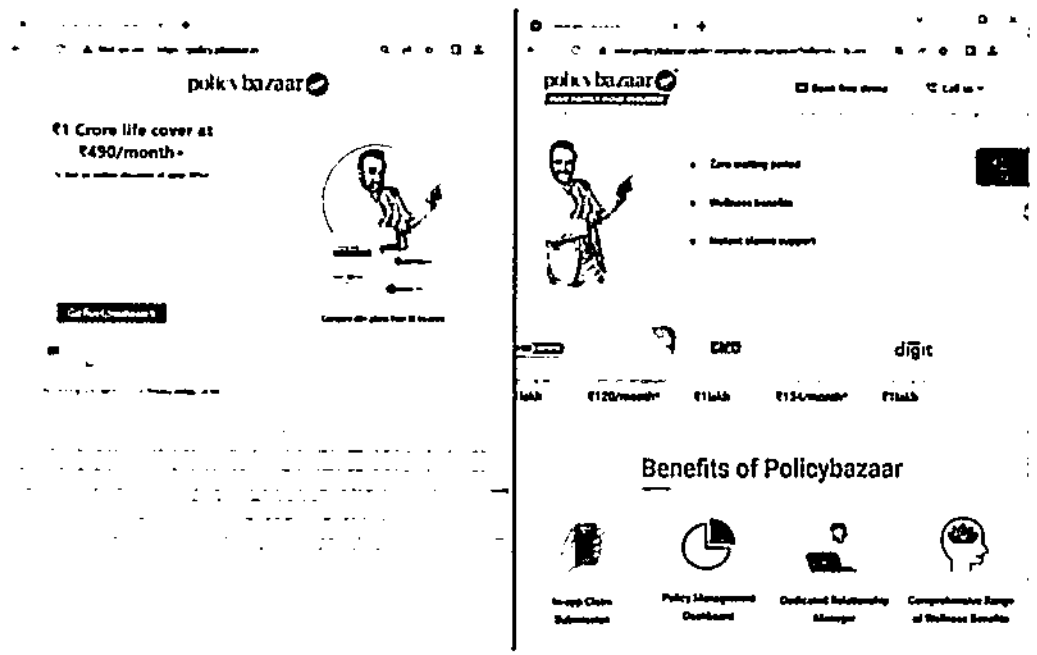
6. The said Defendant has deliberately, and with an intention to dupe innocent customers, started using the impugned webpage which features the Plaintiff's well-known mark "POLICYBAZAAR"/" policybazaar.com". The *mala fides* of Defendant No. 43 is further evident from the fact that the impugned webpage blatantly copies the Plaintiff's copyrighted text/literature and images/artistic works, website layout, e-forms seeking personal information of customers and the exact terms of the offers available on insurance policies, among other things. Further, Defendant No. 43 has also adopted a deceptively similar/ identical favicon, to deceive customers and cause confusion. It is pertinent to note that the impugned domain name "pbazaar.in" features the trademark of the insurance provider "Niva Bupa Health Insurance" but does not seem to be related to the insurer in any manner. Relevant snapshots from the impugned webpage and domain name as on 25.11.2022 are reproduced herein below:



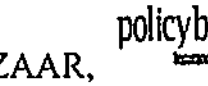


Copy of impugned webpage "policy.pbazaar.in" and impugned domain name "pbazaar.in" are being filed along with the present Application as **Document – 2** and **Document – 3** respectively.

7. It is submitted that the *mala fide* of the Defendant No. 43 is further evidenced by their misuse of the Plaintiff's ad campaign featuring popular Bollywood actor, Pankaj Tripathi. A comparison of the impugned webpage "policy.pbazaar.in" with the Plaintiff's website is reproduced herein below:



8. It is further submitted that Defendant No. 43 is attempting to come as close to the Plaintiff as possible. Pertinently, the hyperlink for "Terms" provided on the impugned webpage "pbazaar.in" redirects to the Plaintiff's website being "policybazaar.com/legal-and-admin-policies/#termsofuse". Evidently, the said Defendant is seeking to mislead the members of the public that its purported insurance services originate from the Plaintiff.

9. It is submitted that the unauthorised and infringing use of the Plaintiff's trademarks POLICYBAZAAR,  ,  , etc., on the impugned webpages constitutes infringement of the Plaintiff's well-known marks and reveals the *mala fide* intent of the Defendant No. 43 to imitate the Plaintiff and defraud innocent customers by inducing them to part with their hard-earned money in the belief that they are transacting with the Plaintiff. It is stated that the members of the public coming across Defendant No. 43's infringing webpages are bound to presume that the Plaintiff has launched a new website and/or introduced new insurance services.

10. It is further submitted that the impugned webpage and domain name are being hosted by the said Defendant with the intent of defrauding and duping innocent customers by impersonating the Plaintiff Company and extracting money from them. Further, the use of the trademark of the insurance provider "Niva Bupa Health Insurance" on the impugned domain name "pbazaar.in" makes it abundantly clear that Defendant No. 43 is a rank infringer who through its impugned activities is seeking to derive illegal gains by trading upon the goodwill enjoyed by the Plaintiff in its well-known mark 'POLICYBAZAAR'. That the Plaintiff has received complaints against the fraudulent and illegal activities of

Defendant No. 43 and there is actual confusion and harm being caused on account of the said Defendant's activities.

11. Further, on conducting a search on web.archive.org for the impugned domain name 'pbazaar.in', a version of the webpage saved on 18.12.2021 is available. However, upon accessing the same, one is automatically redirected to the website, "promotionbazaar.com", which appears to be an entity providing web designing services. It is pertinent to note that the impugned domain name "pbazaar.in" is registered in the name of one "Promotion Bazaar", which is identical to the redirected domain name "promotionbazaar.com". A relevant snapshot from web.archive.org for the impugned domain name "pbazaar.in" as saved on 18.12.2021, is reproduced herein below:

Copy of web archive page for "pbazaar.in" is being filed along with the present Application as **Document – 4**. Further, a copy of the webpage on the domain name "promotionbazaar.com" is being filed as **Document – 5.**

12. It is submitted that the role and involvement of "promotionbazaar.com" in enabling infringement of the Plaintiff's trademarks and copyright is

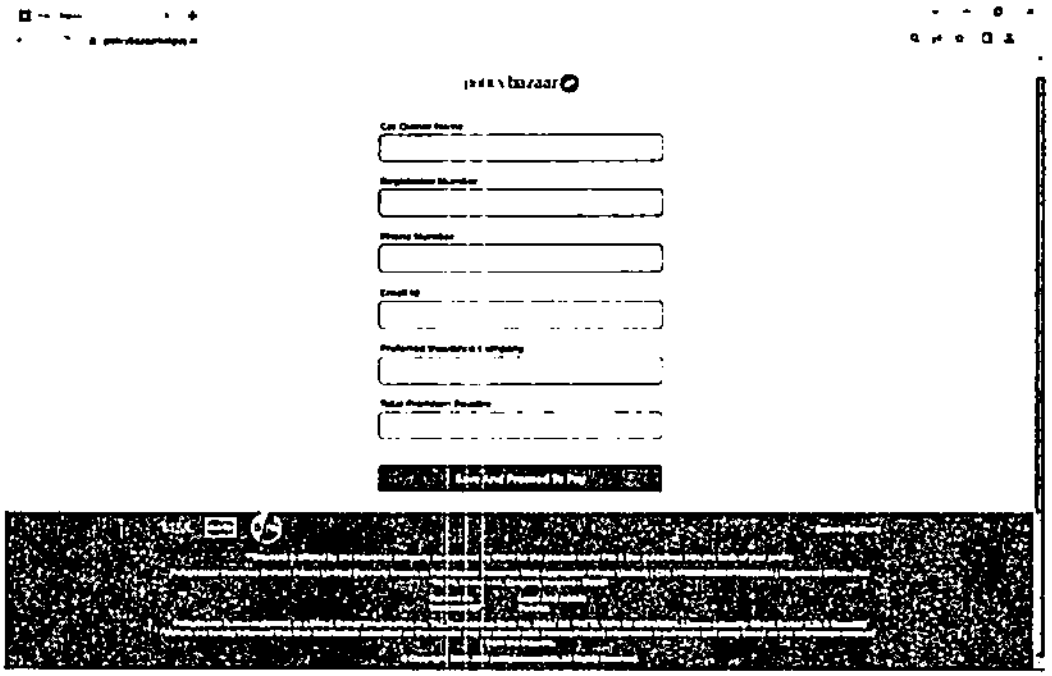
currently being investigated by the Plaintiff and the Plaintiff reserves its right to implead "promotionbazaar.com" and/or any other party depending upon the outcome of such investigation.

DEFENDANT NO. 44

13. The Defendant No. 44 is the Registrant of the domain name "policybazaarlinkpay.in" ("*impugned domain no. 30*"). The said Defendant, recently on 30.11.2022, obtained registration of the impugned domain name, "policybazaarlinkpay.in" which is identical/ deceptively similar to the Plaintiff's well-known trademarks POLICYBAZAAR/PAISABAZAAR and domain names Policybazaar.Com/Paisabazaar.Com. However, the details of the said Defendant No. 44 have been concealed and redacted and as such the said Defendant cannot be identified by the Plaintiff. The said domain "policybazaarlinkpay.in" is registered with the Domain Name Registrar, Endurance Digital Domain Technology LLP (Defendant No. 10). Copy of the Whois details of the said domain name "policybazaarlinkpay.in" is being filed along with the present Application as **Document – 6.**

14. The said Defendant has deliberately and with an intention to dupe innocent customers started using the impugned webpage which features the Plaintiff's well-known mark "POLICYBAZAAR"/ "policybazaar", / "policybazaar". Further, the said Defendant is also misrepresenting itself as the Plaintiff by referring to itself as "Policybazaar Insurance Brokers Private Limited", a sister concern of the Plaintiff and using the registered address and registration number of the Plaintiff on the impugned domain name. The *mala fides* of Defendant No. 44 is further evident from the fact that the impugned webpage blatantly copies the Plaintiff's copyrighted text/literary works,

among other things. A relevant snapshot from the impugned webpage as on 01.12.2022 is reproduced herein below:



A copy of the webpage hosted on the impugned domain name, "policybazaarlinkpay.in" is also being filed along with the present Application as **Document – 7.**

15. It is submitted that the unauthorised and infringing use of the Plaintiff's trademarks POLICYBAZAAR, policybazaar, policybazaar, etc., on the impugned webpage constitutes infringement of the Plaintiff's well-known marks and reveals the *mala fide* intent of the Defendant No. 44 to imitate the Plaintiff and defraud innocent customers by inducing them to part with their hard-earned money in the belief that they are transacting with the Plaintiff. It is stated that the members of the public coming across Defendant No. 44's infringing webpage are bound to presume that the Plaintiff has launched a new website and/or introduced new insurance services.

16. It is further submitted that the impugned domain name is being hosted by the said Defendant with the intent of defrauding and duping innocent

customers by impersonating the Plaintiff Company and extracting money from them. That the Plaintiff has received complaints against the fraudulent and illegal activities of Defendant No. 44 and there is actual confusion and harm being caused on account of the said Defendant's activities.

DEFENDANT NO. 45

17. The Defendant No. 45 is the Registrant of the domain name "salepolicybazaar.com" ("*impugned domain no. 31*"). The said Defendant on 20.05.2022 obtained registration of the impugned domain name, "salepolicybazaar.com" which is identical/deceptively similar to the Plaintiff's well-known trademarks POLICYBAZAAR/ PAISABAZAAR and domain names Policybazaar.Com/ Paisabazaar.Com. However, the details of the said Defendant No. 45 have been concealed and redacted through domain privacy services provided by "Domain By Proxy, LLC" and as such the said Defendant cannot be identified by the Plaintiff. The impugned domain name has been registered with the Defendant No. 9, i.e., GoDaddy.com, LLC. Copy of the Whois details of the said impugned domain name "salepolicybazaar.com" is being filed along with the present Application as **Document – 8.**

18. It is submitted that though the website hosted on the impugned domain name is inactive as on date and displays a "parked free" message from Defendant No. 9 (Domain Name Registrar), the Defendant No. 45 continues to hold the domain name registration. It is pertinent to note that the Registrants of infringing domain names such as the Defendants herein host and operate rogue websites which are activated only at intervals in order to dupe customers. That the Defendants deliberately activate the impugned domains for short durations so as to avoid

detection. A copy of the webpage hosted on the impugned domain name, "salepolicybazaar.com" is also being filed along with the present Application as **Document – 9.**

19. It has further come to the Plaintiff's knowledge that the said Defendant is actively defrauding and duping innocent customers by impersonating the Plaintiff Company and issuing fraudulent communications through the email id "car@salepolicybazaar.com". The Plaintiff has requested its customers to share proof of such fraudulent communication received from Defendant No. 45 from the email id "car@salepolicybazaar.com" and is yet to receive the same. The Plaintiff reserves its rights to file additional documents in this regard as and when proof of such fraudulent communication is received by it.

20. It is thus evident that the impugned domain name and email address are being used by the said Defendant with the intent of defrauding and duping innocent customers by impersonating the Plaintiff Company and extracting money from them. That the Plaintiff has received complaints against the fraudulent and illegal activities of Defendant No. 45 by way of the use of the impugned domain name "salepolicybazaar.com" and the email address "car@salepolicybazaar.com". That there is actual confusion and harm being caused on account of the said Defendant's activities.

<u>DEFENDANTS NO. 46 & 47</u>

21. The Defendant No. 46 is the Registrant of the domain name "policybazaarpayment.co.in" ("*impugned domain no. 32*"). The said Defendant on 10.08.2022 obtained registration of the impugned domain name, "policybazaarpayment.co.in" which is identical/deceptively similar to the Plaintiff's well-known trademarks POLICYBAZAAR/ PAISABAZAAR and domain names Policybazaar.Com/

Paisabazaar.Com. However, the details of the said Defendant No. 46 have been concealed and redacted and as such the said Defendant cannot be identified by the Plaintiff. The impugned domain name has been registered with Defendant No. 9, i.e., GoDaddy.com, LLC. Copy of the Whois details of the said impugned domain name "policybazaarpayment.co.in" is being filed along with the present Application as **Document – 10**. Further, a copy of the webpage hosted on impugned domain name, "policybazaarpayment.co.in" is being filed along with the present Application as **Document – 11**

22. The Defendant No. 47 is the Registrant of the webpage "policybazaar.payments.in" (*"impugned domain/webpage no. 33"*) hosted on the domain name "payments.in". The said domain name is registered in the name of Defendant No. 47 since 16.02.2005. The said domain is registered in the name of one "India Portals", however the contact and address details of the said Defendant No. 47 have been concealed and redacted and as such the said Defendant cannot be identified by the Plaintiff. Further, the Plaintiff is unaware of when the impugned webpage was added as an extension to the domain name "payments.in". The impugned webpage uses the Plaintiff's well-known trademarks POLICYBAZAAR/PAISABAZAAR. The said domain "payments.in" is registered with the Domain Name Registrar, Endurance Digital Domain Technology LLP (Defendant No. 10). Copy of the Whois details of the said domain name "payments.in" of which the impugned webpage is an extension is being filed along with the present Application as **Document – 12.** Copies of the impugned webpage "policybazaar.payments.in" and domain name "payments.in" are being filed along with the present Application as **Document – 13** and **Document 14** respectively.

23. It is submitted that though the impugned domain name "policybazaarpayment.co.in" of Defendant No. 46 as well as the impugned webpage "policybazaar.payments.in" and domain name "payments.in" of Defendant No. 47 are inactive as on date, Defendants No. 46/ 47 continue to hold the respective domain name registrations for the same and are illegally using the Plaintiff's well-known trademarks POLICYBAZAAR/ PAISABAZAAR. It is reiterated that the Registrants of infringing domain names such as the Defendants herein host and operate rogue websites which are activated only at intervals in order to dupe customers. That the Defendants deliberately activate the impugned domains/webpages for short durations so as to avoid detection. This unauthorized and infringing use of the Plaintiff's well-known 'POLICYBAZAAR' mark reveals the *mala fide* intent of Defendants No. 46 & 47 to imitate the Plaintiff and defraud innocent customers by inducing them to part with their hard-earned money in the belief that they are transacting with the Plaintiff.

24. It is pertinent to note that vide Order dated 15.09.2022 in the present suit, this Hon'ble Court was pleased to injunct Defendants No. 31 & 32 who are the registrants of the impugned domain names, "policybazaarpayments.in" and "policybazaarpayment.in" respectively. That the impugned domain name/webpage of Defendants No. 46 & 47 being "policybazaarpayment.co.in" and "policybazaar.payments.in" are suspiciously similar to those of Defendants No. 31 & 32. In light of the above, it is likely that Defendants No. 46 & 47 are related to Defendants No. 31 & 32 and are making minor changes in the impugned domain names/webpages to avoid detection/take down.

25. It is evident that the impugned webpage and domain names are being hosted by the Defendants No. 46 & 47 with the intent of defrauding and duping innocent customers by impersonating the Plaintiff Company and

extracting money from them. That the Plaintiff has received complaints against the fraudulent and illegal activities of Defendants No. 46 and 47 and there is actual confusion and harm being caused on account of the said Defendants' activities.

26. It is thus submitted that the Defendants No. 43 – 47 are in blatant violation of the Plaintiff's exclusive rights held in the well-known trademarks POLICYBAZAAR and PAISABAZAAR. Such illegal use is being made with the sole intent to ride upon the Plaintiff's goodwill and reputation and defraud the actual and potential customers of the Plaintiff. That the Defendants No. 43 – 47 are also liable to be prosecuted for cyber fraud and other criminal offences for which the Plaintiff reserves its right to institute appropriate actions.
27. Further, as the Plaintiff herein is not aware of the identity or any further details of Defendants No. 43 – 47, the Plaintiff reserves its right to make appropriate amendments upon receipt of any such information in the future.
28. In view of foregoing, it is prayed that this Hon'ble Court may be pleased to implead the Defendants No. 43 – 47 to the array of parties in order to enable the Plaintiff herein to seek appropriate reliefs against the said parties. That no prejudice shall be caused to the Defendants in the event the present Application is allowed. While on the other hand, severe hardship shall be caused to the Plaintiff in the event the present application is not allowed. The present Application is being made *bona fide* and in the interests of justice.

PRAYER

Therefore, in view of the facts and circumstances stated above, the Plaintiff prays that this Hon'ble Court may be pleased to:

(a) Allow the present application and implead Defendants No. 43 to 47 into the array of parties in the present suit;

(b) Take on record the amended memo of the parties in the present suit;

(c) Pass any further order or orders as this Hon'ble Court deems fit and proper in the interest of justice.

KAPIL WADHWA, SURYA RAJAPPAN
& VASANTHI HARIHARAN
WADHWA LAW CHAMBERS
Advocates for the Plaintiff
DD-13 Kalkaji, LGF
New Delhi 110019
Mob: 9891929028
Email: kapil@wadhwachambers.com

Place: New Delhi.
Dated: 15.12.2022

IN THE HIGH COURT OF DELHI AT NEW DELHI
(Ordinary Original Civil Jurisdiction)
I.A. NO.____ OF 2022
IN
CS (COMM) NO. 471 OF 2020
CODE No. 36017

IN THE MATTER OF:
PB FINTECH LIMITED ...PLAINTIFF

VERSUS

POLICY BAZAR FINANCE & ORS. ...DEFENDANTS

AFFIDAVIT

I, Deepti Rustagi D/o Subhash Chander Rustagi aged about 44 years, Authorised Representative of the Plaintiff Company having its office at Plot No. 119, Sector – 44, Gurgaon, Haryana – 122001, presently at New Delhi, do hereby solemnly state and affirm as under:

1. That I am the Authorised Representative of the Plaintiff Company in the captioned matter and as such am well acquainted with the facts and circumstances of the present case and hence fully competent to swear the present affidavit.

2. That I have read and understood the contents of the accompanying Application and I say that the contents of the Application are true to the best of my knowledge, information and belief.

NOTARY ALAKA NAYAK Advocate Reg. No. 10619 Period 27/08/2019 to 27/05/2024 DELHI

PB FINTECH LIMITED

DEPONENT

15 DEC 2022

VERIFICATION

I identified the deponent who has signed in my presence.

Verified at New Delhi on this 15 DEC 2022 15 DEC 2022 that the contents of the above affidavit are true and correct to the best of my knowledge. No part of it is wrong and nothing material has been concealed therefrom.

CERTIFIED THAT THE DEPONENT
Shri/Smt./Kni
S/o, W/o R/o
Identified by Shri/Smt.
Has solemnly affirmed before me at
Delhi on
That the contents of the affidavit which have been read & explained to him are true & correct to his knowledge

NOTARY

PB FINTECH LIMITED

DEPONENT

15 DEC 2022

IN THE HIGH COURT OF DELHI AT NEW DELHI
(Ordinary Original Civil Jurisdiction)
I.A. NO. _____ OF 2020
IN
CS (COMM) NO. 471 OF 2020
CODE No. 36017

IN THE MATTER OF:

PB FINTECH LIMITED ...PLAINTIFF

VERSUS

POLICY BAZAR FINANCE & ORS. ...DEFENDANTS

AMENDED MEMO OF THE PARTIES

PB FINTECH LIMITED
Plot No. 119, Sector 44, Gurugram,
Haryana – 122001
Email: enquiry@policybazaar.com .... PLAINTIFF

VERSUS

1. POLICY BAZAR FINANCE
(policybazarfinance.com)
Kolkata, West Bengal- 700019
Email: support@policybazarfinance.com
Ph. No: +91-9163158051 ...DEFENDANT NO. 1

2. PAISA BAZAR FINANCE
(paisabazarfinance.in)
3rd Floor, Upadhyay Estate,
Near Aarey Road Sub Way,
Goregaon West, Mumbai,
Maharashtra - 400062
Email: info@paisabazarfinance.in
Ph. No: +91-9372192491

+91-8987124872 ...DEFENDANT NO. 2

3. PAISABAZAARLOAN
(paisabazaarloanapply.com)
Email: info@paisabazaarloanapply.com
care@paisabazaarloanapply.com
Ph. No: +91-9748408190 ...DEFENDANT NO. 3

4. AGENCY BAZAAR
(agencybazaar.in)
Plot No - 8/216, Sector 8,
Indira Nagar, Lucknow
Uttar Pradesh-226016
Email Id: support@agencybazaar.in
Ph. No: +91-7715879666 ...DEFENDANT NO. 4

5. PAISABAAZAAR
(paisabaazaar.co.in)
2770, N.S.C. Bose Road,
Old 32, Garia Main Road,
Kolkata, West Bengal.
Email: info@paisabaazaar.co.in
Ph. No: +91-75950 37206 ...DEFENDANT NO. 5

6. BALRAM GOPAL
(paisabazaras.com)
B-252, Sinha Colony, Hyderabad
Telangana- 500001
Email: balramsanpdeal@gmail.com

Also at:
City Tower Complex,
Sasthitala Lane, Atghara,
New Town, Kolkata,
West Bengal- 700052
Email: care@paisabazaras.com
Ph. No: +91-8670046793 ...DEFENDANT NO. 6

7. ADYOT GANGULY
(paisabazzarfinance.com)
C-12, Big Splash,
Sector 17, Vashi,
Navi Mumbai, Maharashtra - 400703
Email: adyotganguly@gmail.com
Ph. No. +91- 9871824608

Also at:
105, MI Road, Panch Batti,
New Colony, Jaipur, Rajasthan-302001
Email Id: info@paisabazzarfinance.com
Ph. No: +91-7017661419 ...DEFENDANT NO. 7

8. POLICY BAZAAR CLUB
(policybazaarclub.com)
A-120, Main Road Madanpur Khadar,
Extn. Opposite Harswroop
New Delhi-110076
Email id: info@policybazaarclub.com
Ph. No. +91-9718918989 ...DEFENDANT NO. 8

9. GO DADDY.COM LLC.
14455 N Hayden Rd Ste 219
Scottsdale, AZ, 85260-6993,
United States
Email id: abuse@godaddy.in,
support@godaddy.com ...DEFENDANT NO. 9

10. ENDURANCE DOMAINS TECHNOLOGY LLP
Unit No. 501,5th Floor, IT Building 3,
Nesco IT Park Nesco Complex,
Western Express Highway, Goregaon East,
Mumbai, Maharashtra – 400063
Email: compliance@edtpl.in ...DEFENDANT NO. 10

11. CRAZY DOMAINS FZ-LLC
211, DIC Building 11
Dubai Internet City
Dubai Dubai-500472
United Arab Emirate
Email: customercare@crazydomains.com ...DEFENDANT NO. 11

12. HOSTINGER, UAB
Jonavos g. 60C, 44192
Lithuania
Email: abuse@hostinger.com ...DEFENDANT NO. 12

13. BIGROCK SOLUTIONS LTD
Directiplex, ACME I-Tech Park,
Old Nagardas Rd, Andheri East
Mumbai, Maharashtra - 400069
Email: abuse@bigrock.com ...DEFENDANT NO. 13

14. DEPARTMENT OF TELECOMMUNICATIONS
Ministry of Communications
Sanchar Bhawan, 20 Ashoka Road
New Delhi- 110001
Email: moc-office@gov.in ...DEFENDANT NO. 14

15. MINISTRY OF ELECTRONICS &
INFORMATION TECHNOLOGY
Government of India, Electronics Niketan,
6, CGO Complex,
Lodhi Road, New Delhi – 110003
Email: webmaster@meity.gov.in ...DEFENDANT NO. 15

16. NATIONAL INTERNET EXCHANGE OF INDIA (NIXI)
6C,6D,6E,
Hansalaya Building 15,
Barakhamba Road,
New Delhi-110001
Email: info@nixi.in ...DEFENDANT NO. 16

17. JOHN DOE ...DEFENDANT NO. 17

18. PAISABAZAR ANALYTICS
Block 1st, Koramangala
Bengaluru, Karnataka - 560034
Email ID: info@paisabazar-analytics.com
career@paisabazar-analytics.com
Ph. No.: +91 892-007-0951 ...DEFENDANT NO. 18

19. ONLINE POLICY CARE
(termpolicybazaar.com/ termpolicybazaar.com/home)
1/10, Tilak Nagar,
Delhi - 110018, India
Email ID: care@onlinepolicycare.com
Ph. No.: +91 75576 31792 ...DEFENDANT NO. 19

20. TRAILBLAZER ENTERPRISES
(paisabazaarworld.in)
Gomti Nagar, Lucknow
Uttar Pradesh, India
Email ID: info.trailblazerindia@gmail.com
Ph. No.: 0522-4302060, +91-7309101101,
+91-638-613-5935, +91-98072 52930 ...DEFENDANT NO. 20

21. PRATAP ENTERPRISES
(newpolicybazaar.com)
Andaman and Nicobar Islands, India ...DEFENDANT NO. 21

22. JOSH AZIZI
(paisa-baazar.com)
Kolkata – 700039
West Bengal, India
Email ID: joshazizi180@gmail.com
Ph. No.: +91.9658659856 ...DEFENDANT NO. 22

23. ASRA POLICY BAZAAR
(asrapolicybazaar.com)

Ravi Arcade, Aadarsh Nagar,
Asangaon (East) - 421601
Maharashtra, India
Email ID: contact@asrapolicybazaar.com
Ph. No.: +91 9920927380

ALSO AT:
ABHINAV
Vijay Nagar, Indore,
Madhya Pradesh – 452004
Email: abhinavurbanfinance@gmail.com
Ph. No: +91-9930080316 ...DEFENDANT NO. 23

24. POLICYBAZAAR VEHICLE
(policybazaarvehicle.com)
Maharashtra, India
Email: booking@policybazaarvehicle.com

ALSO AT:
POLICY BAZAAR
20/301, Agro Apartment,
Nariman Point,
Mumbai – 400048
Email: surender1107998@gmail.com
Ph No.: +91-6287689258 ...DEFENDANT NO. 24

25. CARE POLICYBAZAAR
(carepolicybazaar.com)
Delhi, India
Email: car@carepolicybazaar.com

ALSO AT:
REHAN ALI
Najafgarh, Delhi- 110043
Email: rehan43147@gmail.com
Ph No.: +91-9643246904 ...DEFENDANT NO. 25

26. VISHWA KANTI HAI & SONS
(policybazaarinsure.in)
Ph. No: +91-8107633551 ...DEFENDANT NO. 26

27. ZNET TECHNOLOGIES PRIVATE LIMITED
Having its registered office at:
D-10/52, Opp. Chitrakoot Stadium,
Chitrakoot, Vaishali Nagar,
Jaipur-21 (India)
Email: vinod@znetlive.com ...DEFENDANT NO. 27

28. HDFC BANK LIMITED
Bank House, Dr Annie Besant Rd,
Shiv Sagar Estate, Worli, Mumbai,
Maharashtra 400018
Email: support@hdfcbank.com ...DEFENDANT NO. 28

29. BAJAJAJ ALLIANZ
(bajajajallianz.com). ...DEFENDANT NO. 29

30. NAMECHEAP, INC.
Having its registered office at:
4600 East Washington Street, Suite 305,
Phoenix, Arizona- 85034, USA
Email: abuse@namecheap.com ...DEFENDANT NO. 30

31. KANTI GLOBAL SOLUTIONS
(policybazaarpayments.in)
Gujarat, India
Ph. No.: +91-9887348390 ...DEFENDANT NO. 31

32. PANCHAL FINANCES
(policybazaarpayment.in)
Gujarat, India ...DEFENDANT NO. 32

33. 1&1 INTERNET INC.
(paisabazaaronline.org)
Pennsylvania, USA ...DEFENDANT NO. 33

34. PAISA BAZAAR
(paisabazaar.link) ...DEFENDANT NO. 34

35. SUBHASH CHAUDHARY,

(policybazaaragency.educationaldose.com)
Village Pipri Post Sabdeiya Kala,
Basti, Uttar Pradesh – 272002
Email: digitalsubhash07@gmail.com
Ph No.: +91-8850841779 ...DEFENDANT NO. 35

36. PAISA LOAN BAZAAR,
(paisaloanbazaar.com)
Plot No. 3, Sector 32,
GFS Tower, Gurugram
Email: info@paisaloanbazaar.com
Ph No.: +91-9319095352,
+91-7408597609 ...DEFENDANT NO. 36

37. BHANWAR LAL RANWA,
(autopolicybazaar.com)
Prerna Tower, Didwana Road,
Kuchaman City, Dis Nagaur,
Rajasthan – 341508
Email: mrfikct@gmail.com,
enquiry@autopolicybazaar.com,
contact@autopolicybazaar.com
Ph No.: +91-9462042934 ...DEFENDANT NO. 37

38. DEEPAK A,
(nammapolicybazaar.com)
Nagarbhavi, Near Vijaya Nethralaya,
Bangalore, Karnataka – 560062
Email: deepaklicofindia613@gmail.com
Ph No.: +91-9035790457 ...DEFENDANT NO. 38

39. JG POLICY BAZAAR
(jgpolicybazaar.com)
Through Domains By Proxy, LLC.
Email: courtdisputes@godaddy.com ...DEFENDANT NO. 39

40. 1&1 IONOS SE,
2 Logan Square,
100 N 18th St., Suite 400,

Philadelphia, PA 19103, USA
Email: info@ionos.com,
support@ionos.com
Ph. No.: 1-484-254-5555 ...DEFENDANT NO. 40

41. PDR Ltd.,
501, IT Building No 3,
NESCO IT Park, NESCO Complex,
Western Express Highway,
Goregaon (East), Mumbai – 400063
Email: compliance@publicdomainregistry.com,
Ph. No.: +91 (22) 67209000 ...DEFENDANT NO. 41

42. HOSTING CONCEPTS B.V.,
Willem Buytewechstraat 40,
3024 BN Rotterdam,
Netherlands

Also at:
Kipstraat 3c, 5C,
3011 RR Rotterdam,
Netherlands
Email: abuse@registrar.eu
Ph. No.: +31-104482297 ...DEFENDANT NO. 42

43. PROMOTION BAZAAR
(pbazaar.in; policy.pbazaar.in)
Delhi, India ...DEFENDANT NO. 43

44. POLICYBAZAAR LINK PAY
(policybazaarlinkpay.in)
Gujarat, India ...DEFENDANT NO. 44

45. SALE POLICYBAZAAR
(salepolicybazaar.com)
Through Domains By Proxy, LLC.
Email: courtdisputes@godaddy.com;

car@salepolicybazaar.com ...DEFENDANT NO. 45

46. POLICYBAZAAR PAYMENT
(policybazaarpayment.co.in)
Gujarat, India ...DEFENDANT NO. 46

47. INDIA PORTALS
(policybazaar.payments.in)
Maharashtra, India ...DEFENDANT NO. 47

KAPIL WADHWA, SURYA RAJAPPAN
& VASANTHI HARIHARAN
WADHWA LAW CHAMBERS
Advocates for the Plaintiff
DD-13 Kalkaji, LGF
New Delhi 110019
Mob: 9891929028
Email: kapil@wadhwachambers.com

Place: New Delhi.
Dated:17.12.2022

pbazaar.in

Updated 22 hours ago

Domain Information

Domain:	pbazaar.in
Registrar:	GoDaddy.com, LLC
Registered On:	2020-05-04
Expires On:	2023-05-04
Updated On:	2022-08-14
Status:	clientRenewProhibited clientTransferProhibited clientDeleteProhibited clientUpdateProhibited
Name Servers:	ns4.zpowerdns.com ns3.zpowerdns.com ns1.zpowerdns.com ns2.zpowerdns.com

Registrant Contact

Organization:	Promotion Bazaar
State:	Delhi
Country:	IN
Email:	Please contact the Registrar listed above

Administrative Contact

Email:	Please contact the Registrar listed above

Technical Contact

Email:	Please contact the Registrar listed above

Raw Whois Data

```
Domain Name: pbazaar.in
Registry Domain ID: DE1E0EBF53AAD4EA19DC5F0BECC702C80-IN
Registrar WHOIS Server:
Registrar URL: www.godaddy.com
Updated Date: 2022-08-14T08:37:26Z
Creation Date: 2020-05-04T08:47:01Z
Registry Expiry Date: 2023-05-04T08:47:01Z
Registrar: GoDaddy.com, LLC
Registrar IANA ID: 146
Registrar Abuse Contact Email:
Registrar Abuse Contact Phone:
Domain Status: clientRenewProhibited http://www.icann.org/epp#clientRenewProhibited
Domain Status: clientTransferProhibited http://www.icann.org/epp#clientTransferProh
Domain Status: clientDeleteProhibited http://www.icann.org/epp#clientDeleteProhibit
Domain Status: clientUpdateProhibited http://www.icann.org/epp#clientUpdateProhibit
Registry Registrant ID: REDACTED FOR PRIVACY
Registrant Name: REDACTED FOR PRIVACY
```

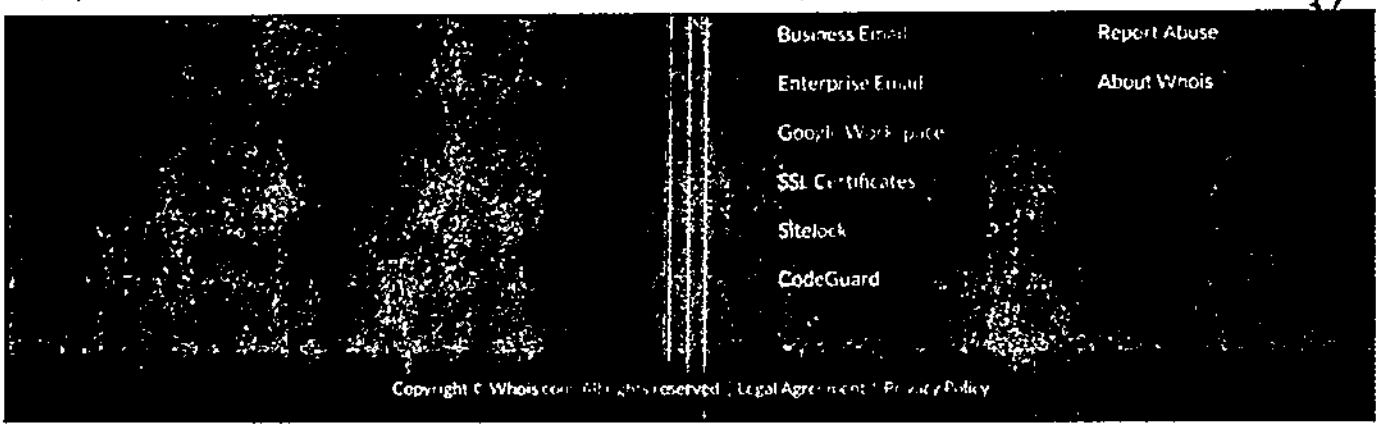
```
Registrant Organization: Promotion Bazaar
Registrant Street: REDACTED FOR PRIVACY
Registrant Street: REDACTED FOR PRIVACY
Registrant Street: REDACTED FOR PRIVACY
Registrant City: REDACTED FOR PRIVACY
Registrant State/Province: Delhi
Registrant Postal Code: REDACTED FOR PRIVACY
Registrant Country: IN
Registrant Phone: REDACTED FOR PRIVACY
Registrant Phone Ext: REDACTED FOR PRIVACY
Registrant Fax: REDACTED FOR PRIVACY
Registrant Fax Ext: REDACTED FOR PRIVACY
Registrant Email: Please contact the Registrar listed above
Registry Admin ID: REDACTED FOR PRIVACY
Admin Name: REDACTED FOR PRIVACY
Admin Organization: REDACTED FOR PRIVACY
Admin Street: REDACTED FOR PRIVACY
Admin Street: REDACTED FOR PRIVACY
Admin Street: REDACTED FOR PRIVACY
Admin City: REDACTED FOR PRIVACY
Admin State/Province: REDACTED FOR PRIVACY
Admin Postal Code: REDACTED FOR PRIVACY
Admin Country: REDACTED FOR PRIVACY
Admin Phone: REDACTED FOR PRIVACY
Admin Phone Ext: REDACTED FOR PRIVACY
Admin Fax: REDACTED FOR PRIVACY
Admin Fax Ext: REDACTED FOR PRIVACY
Admin Email: Please contact the Registrar listed above
Registry Tech ID: REDACTED FOR PRIVACY
Tech Name: REDACTED FOR PRIVACY
Tech Organization: REDACTED FOR PRIVACY
Tech Street: REDACTED FOR PRIVACY
Tech Street: REDACTED FOR PRIVACY
Tech Street: REDACTED FOR PRIVACY
Tech City: REDACTED FOR PRIVACY
Tech State/Province: REDACTED FOR PRIVACY
Tech Postal Code: REDACTED FOR PRIVACY
Tech Country: REDACTED FOR PRIVACY
Tech Phone: REDACTED FOR PRIVACY
Tech Phone Ext: REDACTED FOR PRIVACY
Tech Fax: REDACTED FOR PRIVACY
Tech Fax Ext: REDACTED FOR PRIVACY
Tech Email: Please contact the Registrar listed above
Name Server: ns4.zpowerdns.com
Name Server: ns3.zpowerdns.com
Name Server: ns1.zpowerdns.com
Name Server: ns2.zpowerdns.com
DNSSEC: unsigned
URL of the ICANN Whois Inaccuracy Complaint Form: https://www.icann.org/wicf/
>>> Last update of WHOIS database: 2022-11-24T07:39:04Z <<<

For more information on Whois status codes, please visit https://icann.org/epp

Access to .IN WHOIS information is provided to assist persons in determining the co
```

related domain names

godaddy.com icann.org zpowerdns.com


Business Email
Enterprise Email
Google Workspace
SSL Certificates
Sitelock
CodeGuard
Report Abuse
About Whois
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policybazaar.com DOCUMENT-2

₹1 Crore life cover at ₹490/month+

% Get an online discount of upto 10%#

Get Free Consultation >

By clicking, you agree to our Privacy policy Terms

Compare 40+ plans from 15 Insurers

DOCUMENT-3

₹1 Crore life cover at ₹490/month+

% Get an online discount of upto 10%

Get Free Consultation >

Compare 40+ plans from 15 Insurers

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Loading...

http://pbazaar.in/ |
20:19:15 December 18, 2021

Got an HTTP 301 response at crawl time

Redirecting to...

https://promotionbazaar.com/

DOCUMENT-5

PROMOTION BAZAAR

Ignoring online marketing is like opening a business but not telling anyone.

Grow Your Business With Our Creative Web Design & Development and Prove SEO Strategy

A Digital Marketing Company, Website Design and Web Development

Send Enquiry

Promotion Bazaar is the best Digital marketing company, web design agency and SEO company in Noida, Delhi, India. Being one of the top social media marketing agencies in delhi, India, we're dedicated to delivering state-of-the-art; affordable website design, web development & SEO solutions. These services enable your business to establish online visibility, improve your overall brand identity and increase profits.

NUMBERS SPEAK !

AFFILIATE MARKETING

1,200+ products/services promoted

DIGITAL ADS

Millions spent on ads with ROI >40%

MOBILE MARKETING

5 million people touched via WhatsApp & SMS marketing

WHEN THE ACTION MATTERS

About Us

Here out our story!

PROMOTION BAZAAR is Noida based Digital Media agency and Ad network company, provides all solutions related to digital marketing. Company is currently associated with around 1200+ publishers, 500+ clients and agencies and other clients globally. Currently the company is capable of achieving five million impressions a day. Company has a highly skilled, experienced and dedicated team of experts, who strive to give their best to ensure the best possible output.

KNOW MORE (ABOUT.HTML)

OUR CLIENTS

Send Enquiry

Join our email list for some kick-ass marketing content

Please drop in your email and we will send some amazing content your way!

info@email.com

Refund Policy

We don't have refund policy.

Promotion Bazaar is a team of ace marketers and analysts who help you take your brand to the next level! So level up with us

Important Links

About Us (About.Html)

Services (Services.Html)

Publishers (Publishers.Html)

Advertisers (Advertisers.Html)

Important Links

Privacy Policy (Privacy-Policy.Html)

Terms & Conditions (Terms-&-Conditions.Html)

Sitemap (Sitemap.Html)

Careers (Careers.Html)

Payment (Https://Pages.Razorpay.Com/Pl_GplTpYN5O9u6wz/View)

Get in touch

Mail : Info@Promotionbazaar.In

Phone : +919654612469

Location : D 49 Sector 6 Noida, Uttar Pradesh - 201301

(Https://Www.Facebook.Cor

(Https://Twitter.Com/Pro

(Https://Www.Instagram.Co

End Enquiry

DOCUMENT-6 41

Enter Domain or IP

WHOIS

DOMAINS WEBSITE CLOUD HOSTING SERVERS EMAIL SECURITY WHOIS SUPPORT LOGIN

policybazaarlinkpay.in

Updated 1 second ago

Domain Information

Domain	policybazaarlinkpay.in
Registrar	Endurance Digital Domain Technology LLP
Registered On	2022-11-30
Expires On	2023-11-30
Updated On	2022-12-01
Status	clientTransferProhibited addPeriod
Name Servers	ns1.dns-parking.com ns2.dns-parking.com

Registrant Contact

Organization	N/A
State	Gujarat
Country	IN
Email	Please contact the Registrar listed above

Administrative Contact

Email	Please contact the Registrar listed above

Technical Contact

Email	Please contact the Registrar listed above

Raw Whois Data

```
Domain Name: policybazaarlinkpay.in
Registry Domain ID: D82A95E7530724889A3D3859A1CAE8D50-IN
Registrar WHOIS Server:
Registrar URL: https://publicdomainregistry.com/
Updated Date: 2022-12-01T03:15:01Z
Creation Date: 2022-11-30T09:09:52Z
Registry Expiry Date: 2023-11-30T09:09:52Z
Registrar: Endurance Digital Domain Technology LLP
Registrar IANA ID: 801217
Registrar Abuse Contact Email:
Registrar Abuse Contact Phone:
Domain Status: clientTransferProhibited http://www.icann.org/epp#clientTransferProh
Domain Status: addPeriod http://www.icann.org/epp#addPeriod
Registry Registrant ID: REDACTED FOR PRIVACY
Registrant Name: REDACTED FOR PRIVACY
Registrant Organization: N/A
Registrant Street: REDACTED FOR PRIVACY
Registrant Street: REDACTED FOR PRIVACY
Registrant Street: REDACTED FOR PRIVACY
Registrant City: REDACTED FOR PRIVACY
Registrant State/Province: Gujarat
Registrant Postal Code: REDACTED FOR PRIVACY
Registrant Country: IN
Registrant Phone: REDACTED FOR PRIVACY
Registrant Phone Ext: REDACTED FOR PRIVACY
Registrant Fax: REDACTED FOR PRIVACY
Registrant Fax Ext: REDACTED FOR PRIVACY
Registrant Email: Please contact the Registrar listed above
Registry Admin ID: REDACTED FOR PRIVACY
Admin Name: REDACTED FOR PRIVACY
Admin Organization: REDACTED FOR PRIVACY
Admin Street: REDACTED FOR PRIVACY
Admin Street: REDACTED FOR PRIVACY
Admin Street: REDACTED FOR PRIVACY
Admin City: REDACTED FOR PRIVACY
Admin State/Province: REDACTED FOR PRIVACY
Admin Postal Code: REDACTED FOR PRIVACY
Admin Country: REDACTED FOR PRIVACY
Admin Phone: REDACTED FOR PRIVACY
Admin Phone Ext: REDACTED FOR PRIVACY
Admin Fax: REDACTED FOR PRIVACY
Admin Fax Ext: REDACTED FOR PRIVACY
Admin Email: Please contact the Registrar listed above
Registry Tech ID: REDACTED FOR PRIVACY
Tech Name: REDACTED FOR PRIVACY
Tech Organization: REDACTED FOR PRIVACY
Tech Street: REDACTED FOR PRIVACY
Tech Street: REDACTED FOR PRIVACY
Tech Street: REDACTED FOR PRIVACY
```

Interested in similar domains?

policybazaarlinkpay.com — Buy Now

policybazaarlinkspay.com — Buy Now

policiesbazaarlinkpay.com — Buy Now

dailypolicybazaarlinkpay.com — Buy Now

policybazaarlinkpay.net — Buy Now

policybazaarlinkpayment.com — Buy Now

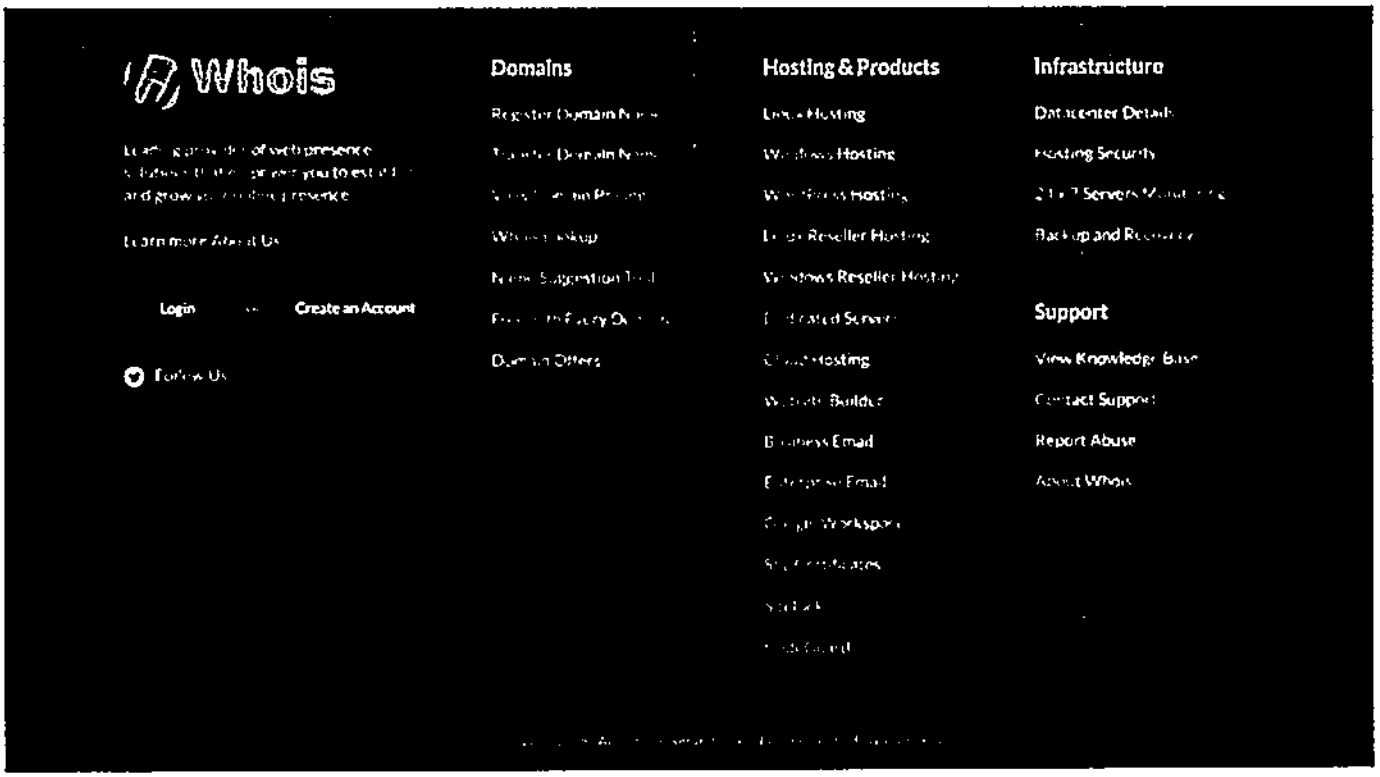
```
Tech City: REDACTED FOR PRIVACY
Tech State/Province: REDACTED FOR PRIVACY
Tech Postal Code: REDACTED FOR PRIVACY
Tech Country: REDACTED FOR PRIVACY
Tech Phone: REDACTED FOR PRIVACY
Tech Phone Ext: REDACTED FOR PRIVACY
Tech Fax: REDACTED FOR PRIVACY
Tech Fax Ext: REDACTED FOR PRIVACY
Tech Email: Please contact the Registrar listed above
Name Server: ns1.dns-parking.com
Name Server: ns2.dns-parking.com
DNSSEC: unsigned
URL of the ICANN Whois Inaccuracy Complaint Form: https://www.icann.org/wicf/
>>> Last update of WHOIS database: 2022-12-01T05:25:15Z <<<

For more information on Whois status codes, please visit https://icann.org/epp

Access to .IN WHOIS information is provided to assist persons in determining the co
```

related domain names

publicdomainregistry.com icann.org dns-parking.com



DOCUMENT-7 44

policybazaar.com

Car Owner Name

Registraion Number

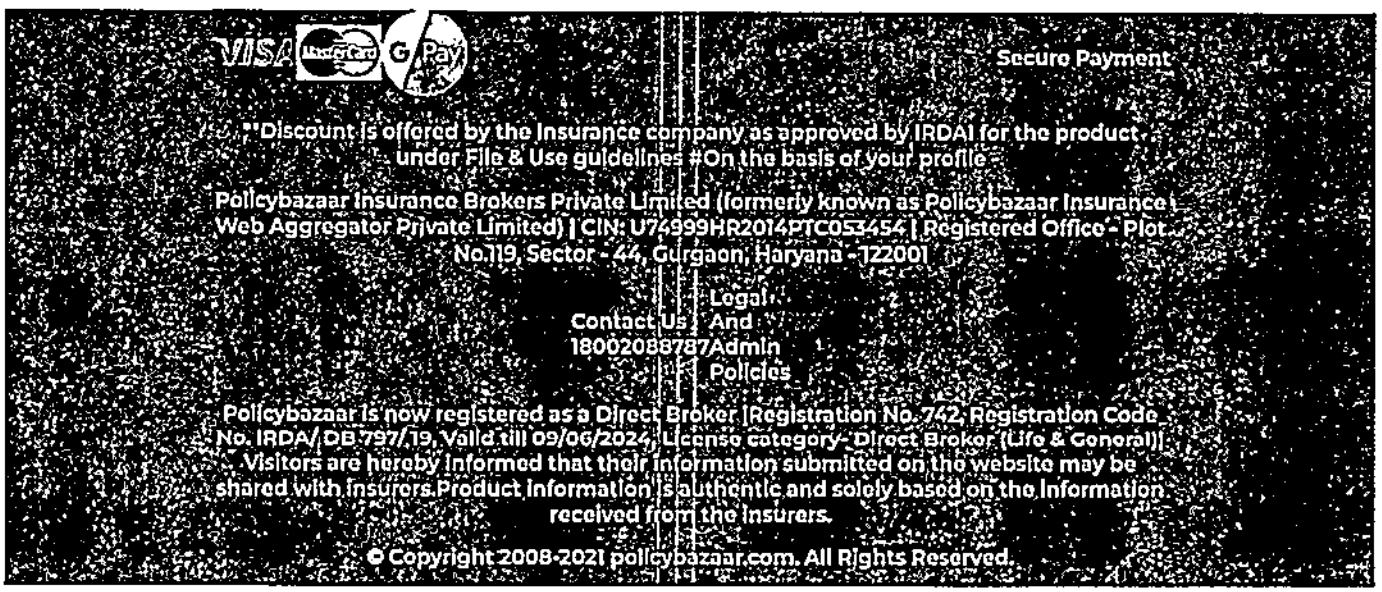
Phone Number

Email Id

Preferred Insurance Company

Total Premium Payable

Save And Proceed To Pay



salepolicybazaar.com

Updated 7 days ago

Domain Information

Domain	salepolicybazaar.com
Registrar	GoDaddy.com, LLC
Registered On	2022-05-20
Expires On	2023-05-20
Updated On	2022-09-22
Status	clientDeleteProhibited clientRenewProhibited clientTransferProhibited clientUpdateProhibited
Name Servers	ns05.domaincontrol.com ns06.domaincontrol.com

Registrant Contact

Name	Registration Private
Organization	Domains By Proxy, LLC
Street	DomainsByProxy.com 2155 E Warner Rd
City	Tempe
State	Arizona
Postal Code	85284
Country	US
Phone	+1.4806242599
Fax	+1.4806242598
Email	Select Contact Domain Holder link at https://www.godaddy.com/whois/results.aspx?domain=salepolicybazaar.com

Administrative Contact

Name	Registration Private
Organization	Domains By Proxy, LLC
Street	DomainsByProxy.com 2155 E Warner Rd
City	Tempe
State	Arizona
Postal Code	85284
Country	US
Phone	+1.4806242599

Fax:	+1.4806242598
Email:	Select Contact Domain Holder link at https://www.godaddy.com/whois/results.aspx?domain=salepolicybazaar.com

Technical Contact

Name	Registration Private
Organization	Domains By Proxy, LLC
Street	DomainsByProxy.com 2155 E Warner Rd
City	Tempe
State	Arizona
Postal Code	85284
Country	US
Phone	+1.4806242599
Fax	+1.4806242598
Email	Select Contact Domain Holder link at https://www.godaddy.com/whois/results.aspx?domain=salepolicybazaar.com

Raw Whois Data

```
Domain Name: salepolicybazaar.com
Registry Domain ID: 2697531895_DOMAIN_COM-VRSN
Registrar WHOIS Server: whois.godaddy.com
Registrar URL: https://www.godaddy.com
Updated Date: 2022-05-20T04:23:25Z
Creation Date: 2022-05-20T04:23:25Z
Registrar Registration Expiration Date: 2023-05-20T04:23:25Z
Registrar: GoDaddy.com, LLC
Registrar IANA ID: 146
Registrar Abuse Contact Email: abuse@godaddy.com
Registrar Abuse Contact Phone: +1.4806242505
Domain Status: clientTransferProhibited https://icann.org/epp#clientTransferProhibi
Domain Status: clientUpdateProhibited https://icann.org/epp#clientUpdateProhibited
Domain Status: clientRenewProhibited https://icann.org/epp#clientRenewProhibited
Domain Status: clientDeleteProhibited https://icann.org/epp#clientDeleteProhibited
Registry Registrant ID: Not Available From Registry
Registrant Name: Registration Private
Registrant Organization: Domains By Proxy, LLC
Registrant Street: DomainsByProxy.com
Registrant Street: 2155 E Warner Rd
Registrant City: Tempe
Registrant State/Province: Arizona
Registrant Postal Code: 85284
Registrant Country: US
Registrant Phone: +1.4806242599
Registrant Phone Ext:
Registrant Fax: +1.4806242598
Registrant Fax Ext:
Registrant Email: Select Contact Domain Holder link at https://www.godaddy.com/whoi
Registry Admin ID: Not Available From Registry
Admin Name: Registration Private
Admin Organization: Domains By Proxy, LLC
Admin Street: DomainsByProxy.com
Admin Street: 2155 E Warner Rd
Admin City: Tempe
Admin State/Province: Arizona
Admin Postal Code: 85284
Admin Country: US
Admin Phone: +1.4806242599
Admin Phone Ext:
Admin Fax: +1.4806242598
Admin Fax Ext:
Admin Email: Select Contact Domain Holder link at https://www.godaddy.com/whois/res
Registry Tech ID: Not Available From Registry
Tech Name: Registration Private
```

```
Tech Organization: Domains By Proxy, LLC
Tech Street: DomainsByProxy.com
Tech Street: 2155 E Warner Rd
Tech City: Tempe
Tech State/Province: Arizona
Tech Postal Code: 85284
Tech Country: US
Tech Phone: +1.4806242599
Tech Phone Ext:
Tech Fax: +1.4806242598
Tech Fax Ext:
Tech Email: Select Contact Domain Holder link at https://www.godaddy.com/whois/resu
Name Server: NS05.DOMAINCONTROL.COM
Name Server: NS06.DOMAINCONTROL.COM
DNSSEC: unsigned
URL of the ICANN WHOIS Data Problem Reporting System: http://wdprs.internic.net/
>>> Last update of WHOIS database: 2022-11-15T12:13:26Z <<<
For more information on Whois status codes, please visit https://icann.org/epp

TERMS OF USE: The data contained in this registrar's Whois database, while believed
registrar to be reliable, is provided "as is" with no guarantee or warranties regar
accuracy. This information is provided for the sole purpose of assisting you in obt
information about domain name registration records. Any use of this data for any ot
is expressly forbidden without the prior written permission of this registrar. By s
an inquiry, you agree to these terms and limitations of warranty. In particular, yo
to use this data to allow, enable, or otherwise support the dissemination or collec
data, in part or in its entirety, for any purpose, such as transmission by e-mail,
postal mail, facsimile or other means of mass unsolicited, commercial advertising o
of any kind, including spam. You further agree not to use this data to enable high
or robotic electronic processes designed to collect or compile this data for any pu
mining this data for your own personal or commercial purposes. Failure to comply wi
may result in termination of access to the Whois database. These terms may be subje
at any time without notice.
```

related domain names

godaddy.com icann.org domaincontrol.com domainsbyproxy.com internic.net

GoDaddy

salepolicybazaar.com

is parked free, courtesy of GoDaddy.com.

Get This Domain

Related searches

- Home Bangalore
- Clothing Store
- Policy

49

DOCUMENT-10

Whois identity for everyone

Enter Domain or IP WHOIS

DOMAINS WEBSITE CLOUD HOSTING SERVERS EMAIL SECURITY WHOIS SUPPORT LOGIN 0

policybazaarpayment.co.in

Updated 1 second ago

Domain Information

Domain:	policybazaarpayment.co.in
Registrar:	GoDaddy.com, LLC
Registered On:	2022-08-10
Expires On:	2023-08-10
Updated On:	2022-10-04
Status:	clientDeleteProhibited clientHold clientTransferProhibited clientRenewProhibited clientUpdateProhibited
Name Servers:	ns15.domaincontrol.com ns16.domaincontrol.com

Registrant Contact

State:	Gujarat
Country:	IN
Email:	Please contact the Registrar listed above

Administrative Contact

Email:	Please contact the Registrar listed above

Technical Contact

Email:	Please contact the Registrar listed above

Raw Whois Data

```
Domain Name: policybazaarpayment.co.in
Registry Domain ID: D589A0BBE0097409BB966871B7938B39F-IN
Registrar WHOIS Server:
Registrar URL: www.godaddy.com
Updated Date: 2022-10-04T22:27:37Z
Creation Date: 2022-08-10T11:58:55Z
Registry Expiry Date: 2023-08-10T11:58:55Z
Registrar: GoDaddy.com, LLC
Registrar IANA ID: 146
Registrar Abuse Contact Email:
Registrar Abuse Contact Phone:
Domain Status: clientDeleteProhibited http://www.icann.org/epp#clientDeleteProhibit
Domain Status: clientHold http://www.icann.org/epp#clientHold
Domain Status: clientTransferProhibited http://www.icann.org/epp#clientTransferProh
Domain Status: clientRenewProhibited http://www.icann.org/epp#clientRenewProhibited
```

Interested in similar domains?

policybazaarpayment.com	Buy Now
policybazaarpayments.com	Buy Now
policybazaarpaymentservices.com	Buy Now
policiesbazaarpayment.com	Buy Now
policybazaarpayment.net	Buy Now
policybazaarpayments.net	Buy Now

```
Domain Status: clientUpdateProhibited http://www.icann.org/epp#clientUpdateProhibit
Registry Registrant ID: REDACTED FOR PRIVACY
Registrant Name: REDACTED FOR PRIVACY
Registrant Organization:
Registrant Street: REDACTED FOR PRIVACY
Registrant Street: REDACTED FOR PRIVACY
Registrant Street: REDACTED FOR PRIVACY
Registrant City: REDACTED FOR PRIVACY
Registrant State/Province: Gujarat
Registrant Postal Code: REDACTED FOR PRIVACY
Registrant Country: IN
Registrant Phone: REDACTED FOR PRIVACY
Registrant Phone Ext: REDACTED FOR PRIVACY
Registrant Fax: REDACTED FOR PRIVACY
Registrant Fax Ext: REDACTED FOR PRIVACY
Registrant Email: Please contact the Registrar listed above
Registry Admin ID: REDACTED FOR PRIVACY
Admin Name: REDACTED FOR PRIVACY
Admin Organization: REDACTED FOR PRIVACY
Admin Street: REDACTED FOR PRIVACY
Admin Street: REDACTED FOR PRIVACY
Admin Street: REDACTED FOR PRIVACY
Admin City: REDACTED FOR PRIVACY
Admin State/Province: REDACTED FOR PRIVACY
Admin Postal Code: REDACTED FOR PRIVACY
Admin Country: REDACTED FOR PRIVACY
Admin Phone: REDACTED FOR PRIVACY
Admin Phone Ext: REDACTED FOR PRIVACY
Admin Fax: REDACTED FOR PRIVACY
Admin Fax Ext: REDACTED FOR PRIVACY
Admin Email: Please contact the Registrar listed above
Registry Tech ID: REDACTED FOR PRIVACY
Tech Name: REDACTED FOR PRIVACY
Tech Organization: REDACTED FOR PRIVACY
Tech Street: REDACTED FOR PRIVACY
Tech Street: REDACTED FOR PRIVACY
Tech Street: REDACTED FOR PRIVACY
Tech City: REDACTED FOR PRIVACY
Tech State/Province: REDACTED FOR PRIVACY
Tech Postal Code: REDACTED FOR PRIVACY
Tech Country: REDACTED FOR PRIVACY
Tech Phone: REDACTED FOR PRIVACY
Tech Phone Ext: REDACTED FOR PRIVACY
Tech Fax: REDACTED FOR PRIVACY
Tech Fax Ext: REDACTED FOR PRIVACY
Tech Email: Please contact the Registrar listed above
Name Server: ns15.domaincontrol.com
Name Server: ns16.domaincontrol.com
DNSSEC: unsigned
URL of the ICANN Whois Inaccuracy Complaint Form: https://www.icann.org/wicf/
>>> Last update of WHOIS database: 2022-10-26T14:46:23Z <<<

For more information on Whois status codes, please visit https://icann.org/epp

Access to .IN WHOIS information is provided to assist persons in determining the co
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related domain names

godaddy.com icann.org domaincontrol.com

Learn more About Us

or

Follow Us

Whois Lookup
Name Suggestion Tool
Free with Every Domain
Domain Offers

Linux Reseller Hosting
Windows Reseller Hosting
Dedicated Servers
Cloud Hosting
Website Builder
Business Email
Enterprise Email
Google Workspace
SSL Certificates
Sitelock
CodeGuard

Backup and Recovery

Support

View Knowledge Base
Contact Support
Report Abuse
About Whois

This site can't be reached

Check if there is a typo in policybazaarpayment.co.in.

If spelling is correct, try running Windows Network Diagnostics.

DNS_PROBE_FINISHED_NXDOMAIN

Reload

Whois
Identity for everyone

Enter Domain or IP WHOIS

DOMAINS WEBSITE CLOUD HOSTING SERVERS EMAIL SECURITY WHOIS SUPPORT LOGIN 0

payments.in

Updated 1 second ago

Domain Information

Domain:	payments.in
Registrar:	Endurance Digital Domain Technology LLP
Registered On:	2005-02-16
Expires On:	2023-02-16
Updated On:	2022-04-22
Status:	clientTransferProhibited
Name Servers:	apple.indiaportals.org orange.indiaportals.org

Registrant Contact

Organization:	India Portals
State:	Maharashtra
Country:	IN
Email:	Please contact the Registrar listed above

Administrative Contact

Email:	Please contact the Registrar listed above

Technical Contact

Email:	Please contact the Registrar listed above

Raw Whois Data

```
Domain Name: payments.in
Registry Domain ID: D480266-IN
Registrar WHOIS Server:
Registrar URL: https://publicdomainregistry.com/
Updated Date: 2022-04-22T18:07:59Z
Creation Date: 2005-02-16T06:30:20Z
Registry Expiry Date: 2023-02-16T06:30:20Z
Registrar: Endurance Digital Domain Technology LLP
Registrar IANA ID: 801217
Registrar Abuse Contact Email:
Registrar Abuse Contact Phone:
Domain Status: clientTransferProhibited http://www.icann.org/epp#clientTransferProh
Registry Registrant ID: REDACTED FOR PRIVACY
Registrant Name: REDACTED FOR PRIVACY
Registrant Organization: India Portals
Registrant Street: REDACTED FOR PRIVACY
Registrant Street: REDACTED FOR PRIVACY
```

Interested in similar domains?

investpayments.com	Buy Now
paymentsinvest.com	Buy Now
paymentscom.com	Buy Now
qualitypaymentsdirect.com	Buy Now
paymentsbank.net	Buy Now
localpaymentsdirect.com	Buy Now

```
Registrant Street: REDACTED FOR PRIVACY
Registrant City: REDACTED FOR PRIVACY
Registrant State/Province: Maharashtra
Registrant Postal Code: REDACTED FOR PRIVACY
Registrant Country: IN
Registrant Phone: REDACTED FOR PRIVACY
Registrant Phone Ext: REDACTED FOR PRIVACY
Registrant Fax: REDACTED FOR PRIVACY
Registrant Fax Ext: REDACTED FOR PRIVACY
Registrant Email: Please contact the Registrar listed above
Registry Admin ID: REDACTED FOR PRIVACY
Admin Name: REDACTED FOR PRIVACY
Admin Organization: REDACTED FOR PRIVACY
Admin Street: REDACTED FOR PRIVACY
Admin Street: REDACTED FOR PRIVACY
Admin Street: REDACTED FOR PRIVACY
Admin City: REDACTED FOR PRIVACY
Admin State/Province: REDACTED FOR PRIVACY
Admin Postal Code: REDACTED FOR PRIVACY
Admin Country: REDACTED FOR PRIVACY
Admin Phone: REDACTED FOR PRIVACY
Admin Phone Ext: REDACTED FOR PRIVACY
Admin Fax: REDACTED FOR PRIVACY
Admin Fax Ext: REDACTED FOR PRIVACY
Admin Email: Please contact the Registrar listed above
Registry Tech ID: REDACTED FOR PRIVACY
Tech Name: REDACTED FOR PRIVACY
Tech Organization: REDACTED FOR PRIVACY
Tech Street: REDACTED FOR PRIVACY
Tech Street: REDACTED FOR PRIVACY
Tech Street: REDACTED FOR PRIVACY
Tech City: REDACTED FOR PRIVACY
Tech State/Province: REDACTED FOR PRIVACY
Tech Postal Code: REDACTED FOR PRIVACY
Tech Country: REDACTED FOR PRIVACY
Tech Phone: REDACTED FOR PRIVACY
Tech Phone Ext: REDACTED FOR PRIVACY
Tech Fax: REDACTED FOR PRIVACY
Tech Fax Ext: REDACTED FOR PRIVACY
Tech Email: Please contact the Registrar listed above
Name Server: apple.indiaportals.org
Name Server: orange.indiaportals.org
DNSSEC: unsigned
URL of the ICANN Whois Inaccuracy Complaint Form: https://www.icann.org/wicf/
>>> Last update of WHOIS database: 2022-10-26T14:47:27Z <<<

For more information on Whois status codes, please visit https://icann.org/epp

Access to .IN WHOIS information is provided to assist persons in determining the co
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related domain names

publicdomainregistry.com icann.org indiaportals.org

Follow Us

Domain Offers

Cloud Hosting

Website Builder

Business Email

Enterprise Email

Google Workspace

SSL Certificates

Sitelock

CodeGuard

View Knowledge Base

Contact Support

Report Abuse

About Whois

DOCUMENT-13

This site can't be reached

Check if there is a typo in policybazaar.payments.in.

If spelling is correct, try running Windows Network Diagnostics.

DNS_PROBE_FINISHED_NXDOMAIN

Reload

DOCUMENT-14

This site can't be reached

payments.in's server IP address could not be found

Try:

- Checking the connection
- Checking the proxy, firewall, and DNS configuration
- Running Windows Network Diagnostics

ERR_NAME_NOT_RESOLVED

Reload Details

IN THE HIGH COURT OF DELHI AT NEW DELHI
(ORDINARY ORIGINAL CIVIL JURISDICTION)
CS (COMM) NO. 471 OF 2020
CODE NO. 36017

IN THE MATTER OF:
PB FINTECH LIMITED ...PLAINTIFF

VERSUS

POLICY BAZAR FINANCE & ORS. ...DEFENDANTS

AFFIDAVIT OF SERVICE

I, Surya Rajappan, aged 30 years, D/o Mr. Rajappan G., working at Wadhwa Law Chambers, DD-13, Kalkaji, LGF, New Delhi – 110019, do hereby solemnly affirm and declare as under:-

1. I am one of the Counsels for the Plaintiff in the above-captioned matter having the enrolment no. D/2391/2016.
2. I have effected service of the Application under Order 1 Rule 10 read with Section 151, CPC upon Defendant No. 10 at compliance@edtpl.in, Defendant No. 14 at moc-office@gov.in, Defendant No. 15 at webmaster@meity.gov.in, Defendant No. 45 at courtdisputes@godaddy.com and car@salepolicybazaar.com, and upon Defendant No. 9 through their Counsels at their email ids shweta.sahu@nishithdesai.com and godaddylitigation.nda@nishithdesai.com on 17.12.2022 at 03:28 PM.

NOTARY * GOVT. OF INDIA
Debajyoti Behura
Advocate
Regn. No. 19716
Period: 24/02/2020 to 24/02/2025
Central Delhi

3. I say that the aforesaid service upon Defendant No. 9, 10, 14-15, and 45 did not bounce back and stands complete. Proof of service to the aforesaid Defendants is being annexed herewith as **Document-A.**
4. I further say that Defendants No. 43-44 and 46-47 being the Registrants of rogue websites, are not identifiable by the Plaintiff and as such no address or contact details for service are available with the Plaintiff.
5. I state that the contents of the present Affidavit are true and correct to the best of my knowledge and based upon the records available with the office.

DEPONENT

I identified the deponent who has signed in my presence.

17 DEC 2022

VERIFICATION

I, Surya Rajappan, the deponent hereinabove, do hereby verify the contents of this Affidavit to be true and correct to the best of my knowledge and belief and state that no part of this Affidavit is false and nothing material has been omitted therefrom.

Verified on this the 17 DEC 2022 day of December, 2022.

NOTARY
Debajyoti Behuria
Advocate
Regn. No. 19716
Period: 24/02/2020
to 24/02/2025
Central Delhi
GOVT. OF INDIA

CERTIFIED THAT THE DEPONENT
S/o, W/o R/o
Identified by Shri/Smt
Has appeared before me at
Delhi on 17 DEC 2022
That the contents of the affidavit which have been read & explained to him/her are true & correct to his/her knowledge

NOTARY

17 DEC 2022

DEPONENT

60

DOCUMENT-A

Gmail

Surya Rajappan <surya@wadhwachambers.com>

Service of Interim Applications in CS(Comm) 471/2020 titled "PB Fintech Pvt. Ltd. v Policy Bazar Finance & Ors." pending before the Hon'ble High Court of Delhi

Surya Rajappan <surya@wadhwachambers.com> Sat, Dec 17, 2022 at 3:28 PM
To: compliance@edtpl.in, moc-office@gov.in, webmaster@meity.gov.in, courtdisputes@godaddy.com, car@salepolicybazaar.com, shweta.sahu@nishithdesai.com, godaddylitigation.nda@nishithdesai.com
Cc: Kapil Wadhwa <kapil@wadhwachambers.com>, Vasanthi Hariharan <vasanthi@wadhwachambers.com>

Dear Sir/Ma'am,

We write to you with respect to the captioned matter wherein we represent the Plaintiff.

Kindly find attached herewith Drive links to the following documents:

1. Application under Order 1 Rule 10, CPC r/w Sec. 151, CPC seeking impleadment of Defendants No. 43 and 47 to the array of parties.

2. Application under Order 39 Rule 1 & 2, CPC r/w Sec. 151, CPC seeking interim injunction against Defendants No. 43-47 and directions against Defendants No. 9, 10, and 14-15.

Appl. under Order 1 Rule 10, CPC.pdf

Appl. under Order 39 Rules 1&2, CPC.pdf

We request you to kindly acknowledge receipt of this email.

Regards,
Surya Rajappan (Ms.)
Advocate

Wadhwa Law Chambers
DD-13, LGF, Kalkaji
New Delhi 110019
Tel: +91 11 26232344
Mob: + 91 9873595315
Email: surya@wadhwachambers.com

IN THE HIGH COURT OF DELHI AT NEW DELHI
(Ordinary Original Civil Jurisdiction)
I.A. NO.____OF 2022
IN
CS (COMM) NO. 471 OF 2020
CODE No. 36017

IN THE MATTER OF:
PB FINTECH LIMITED ...PLAINTIFF

VERSUS

POLICY BAZAR FINANCE & ORS. ...DEFENDANTS

NDOH: 24.01.2023

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KAPIL WADHWA, SURYA RAJAPPAN
& VASANTHI HARIHARAN
WADHWA LAW CHAMBERS
Advocates for the Plaintiff
DD-13 Kalkaji, LGF
New Delhi 110019
Mob: 9891929028
Email: kapil@wadhwachambers.com

Place: New Delhi.
Dated: 17.12.2022

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COURT FEES

:: Court Fee Receipt Details

Litigant Name	PB FINTECH LIMITED
Location Name	NCT OF DELHI
Account Reference	VASANTHI HARIHARAN
Court Fee UIN	DLCT1721L2230O120
Court Fee Amount	20

Print Receipt

IN THE HIGH COURT OF DELHI AT NEW DELHI
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URGENT APPLICATION

To,
The Registrar
High Court of Delhi
New Delhi

Sir,

You are requested to kindly treat the accompanying Application as an urgent one in accordance with the rules of the Hon'ble High Court of Delhi for the reasons prayed for in the accompanying Application.

Yours Sincerely,

KAPIL WADHWA, SURYA RAJAPPAN
& VASANTHI HARIHARAN
WADHWA LAW CHAMBERS
Advocates for the Plaintiff
DD-13 Kalkaji, LGF
New Delhi 110019
Mob: 9891929028
Email: kapil@wadhwachambers.com

Place: New Delhi.
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NOTICE OF MOTION

Sir/ Ma'am,

Kindly take note that the accompanying Application is being filed before the Hon'ble High Court of Delhi and the same is likely to be listed on 20.12.2022 or thereafter.

Yours sincerely,

KAPIL WADHWA, SURYA RAJAPPAN
& VASANTHI HARIHARAN
WADHWA LAW CHAMBERS
Advocates for the Plaintiff
DD-13 Kalkaji, LGF
New Delhi 110019
Mob: 9891929028
Email: kapil@wadhwachambers.com

Place: New Delhi.
Dated: 17.12.2022

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IN THE MATTER OF:
PB FINTECH LIMITED ...PLAINTIFF

VERSUS

POLICY BAZAR FINANCE & ORS. ...DEFENDANTS

APPLICATION ON BEHALF OF PLAINTIFF UNDER ORDER 39 RULES 1 & 2 READ WITH SECTION 151 OF THE CODE OF CIVIL PROCEDURE, 1908 SEEKING INTERIM INJUNCTION AGAINST DEFENDANTS NO. 43 TO 47 AND DIRECTIONS AGAINST DEFENDANTS NO. 9, 10 & 14 – 15.

The Plaintiff, above-named, most respectfully submits:

1. The present suit has been instituted by the Plaintiff seeking permanent injunction restraining infringement, passing off, damages etc. by several rogue third-party websites hosted on identical/deceptively similar domain names violating Plaintiff's rights in its well-known trademarks POLICYBAZAAR and PAISABAZAAR.
2. That vide order dated 11.11.2020, this Hon'ble Court was pleased to grant an *ad-interim ex-parte* injunction, whereby Defendants No. 1 to 8, their agents, employees, partners and associates were restrained from using the trademark/logo "POLICYBAZAAR" and "PAISABAZAAR" or any other deceptively similar mark or logo thereto including their respective domain names administered by Defendants No. 1 to 8; Defendants No. 9 to 13 were directed to block/suspend the websites of Defendants No. 1 to 8 registered with them; Defendants No. 14 and 15

were directed to issue notifications to various internet service providers and telecom service providers to block access to the infringing domain names of Defendants No. 1 to 8; and the Plaintiff was further granted liberty to approach this Court to array other rogue website(s) carrying on similar activities, as and when detected. Subsequently, Defendants No. 18 – 42 were impleaded, and appropriate orders were passed against the said defendants.

3. It is submitted that the Plaintiff has recently discovered more rogue websites hosted on identical/deceptively similar domain names which violate Plaintiff's rights in the well-known trademarks POLICYBAZAAR and PAISABAZAAR. The Plaintiff, vide a separate Application, has already sought impleadment of these additional infringers as Defendants No. 43 to 47. Additionally, the present application is being filed in order to seek extension of the Injunction Order dated 11.11.2020 to the said Defendants No. 43 to 47 along with the Domain name Registrars i.e., Defendant No. 9 and 10. For a holistic view, a table depicting the "impugned domain names" with their corresponding Domain Name Registrars against whom injunction/direction is sought is as below:

S. No.	Registrant	Impugned Domain/ Webpage Name	Domain Registrars
1.	Defendant No. 43	pbazaar.in; policy.pbazaar.in	Defendant No. 9 (GoDaddy.com, LLC)
2.	Defendant No. 44	policybazaarlinkpay.in	Defendant No. 10 (Endurance Digital Domain Technology LLP)
3.	Defendant	salepolicybazaar.com	Defendant No. 9

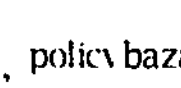
	No. 45		(GoDaddy.com, LLC)
4.	Defendant No. 46	policybazaarpayment.co.in	Defendant No. 9 (GoDaddy.com, LLC)
5.	Defendant No. 47	policybazaar.payments.in	Defendant No. 10 (Endurance Digital Domain Technology LLP)

4. That the contents of the Plaint shall be applicable to the said Defendants No. 43 to 47 and any other rogue websites discovered in the future and are not being reproduced for the sake of brevity and to avoid repetition. Therefore, the Plaintiff craves the leave and liberty of this Hon'ble Court to treat the averments made in the Plaint as part and parcel of the instant Application, and to deem the same to be incorporated herein.

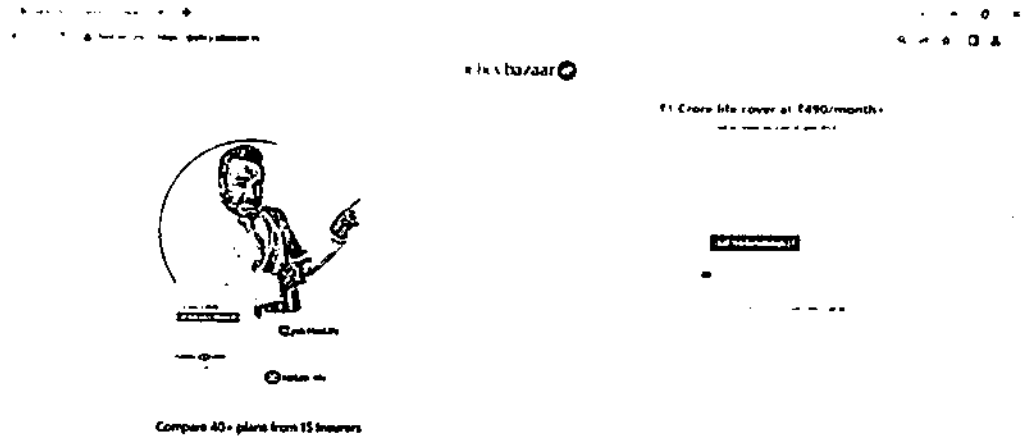
DEFENDANT NO. 43

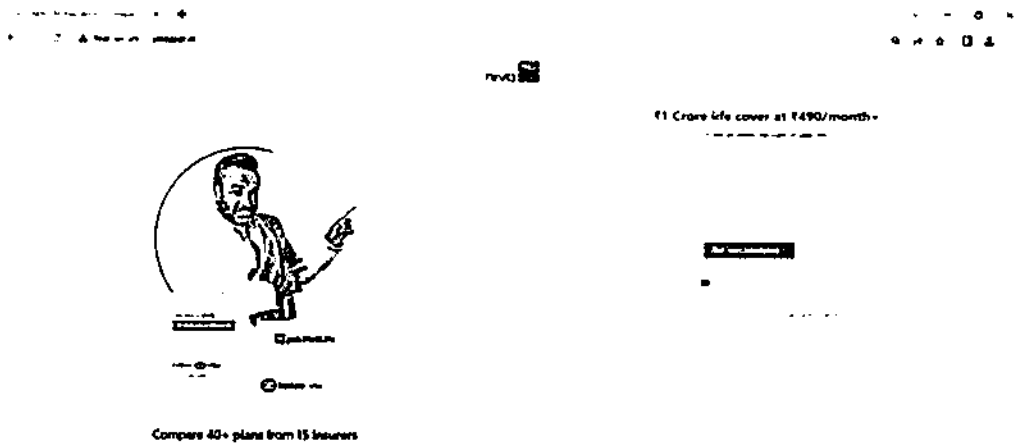
5. The Defendant No. 43 is the Registrant of the domain name "pbazaar.in" ("*impugned domain no. 28*") and the webpage hosted thereon, "policy.pbazaar.in" ("*impugned domain/webpage no. 29*"). The said Defendant on 04.05.2020 obtained registration of the impugned domain name, "pbazaar.in" which is identical/ deceptively similar to the Plaintiff's well-known trademarks POLICYBAZAAR/PAISABAZAAR and domain names Policybazaar.Com/Paisabazaar.Com. The said domain is registered in the name of one "Promotion Bazaar", however the contact and address details of the said Defendant No. 43 have been concealed and redacted and as such the said Defendant cannot be identified by the Plaintiff. The Plaintiff is unaware of when the impugned webpage was added as an extension to the domain name

"pbazaar.in" by the said Defendant. The impugned domain name has been registered with Defendant No. 9, i.e., GoDaddy.com, LLC.

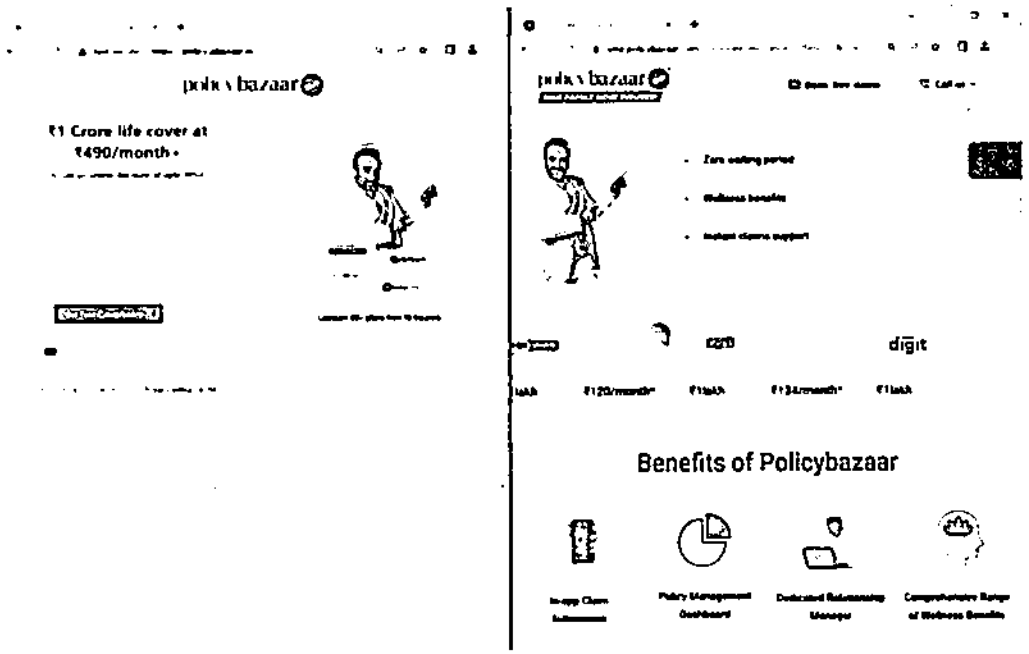
6. It is submitted that Defendant No. 43 is also making an infringing and unauthorised use of the Plaintiff's trademarks POLICYBAZAAR,  ,  , etc., on its webpage hosted on the impugned domain name, "pbazaar.in". Further, the said Defendant is also misrepresenting itself as the Plaintiff by using the registered address and registration number of the Plaintiff on both the impugned domain name as well as the impugned webpage.

7. The said Defendant has deliberately, and with an intention to dupe innocent customers, started using the impugned webpage which features the Plaintiff's well-known mark "POLICYBAZAAR"/"  ". The *mala fides* of Defendant No. 43 is further evident from the fact that the impugned webpage blatantly copies the Plaintiff's copyrighted text/literary and images/artistic works, website layout, e-forms seeking personal information of customers and the exact terms of the offers available on insurance policies, among other things. Further, Defendant No. 43 has also adopted a deceptively similar/ identical favicon, to deceive customers and cause confusion. It is pertinent to note that the impugned domain name "pbazaar.in" features the trademark of the insurance provider "Niva Bupa Health Insurance" but does not seem to be related to the insurer in any manner. Relevant snapshots from the impugned webpage and domain name as on 25.11.2022 are reproduced herein below:





8. It is submitted that the *mala fide* of the Defendant No. 43 is further evidenced by their misuse of the Plaintiff's ad campaign featuring popular Bollywood actor, Pankaj Tripathi. A comparison of the impugned webpage "policy.pbazaar.in" with the Plaintiff's website is reproduced herein below:



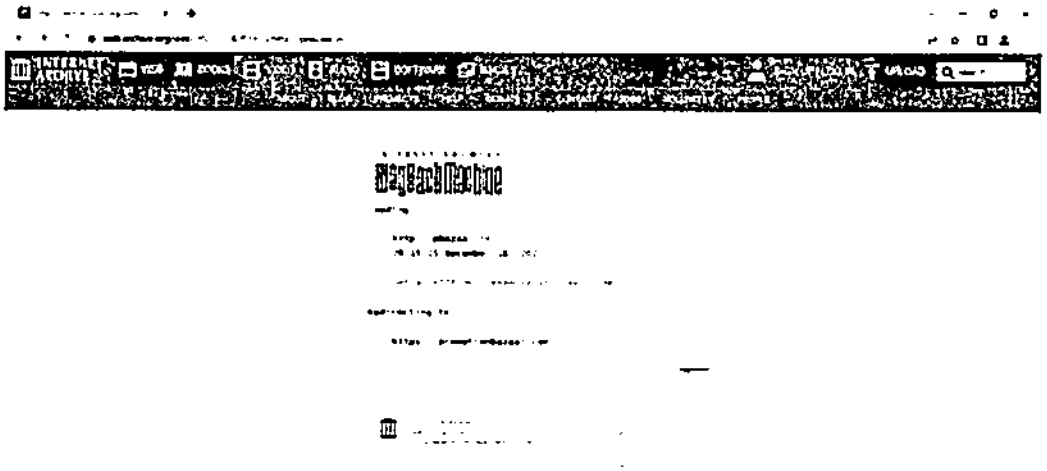
9. It is further submitted that Defendant No. 43 is attempting to come as close to the Plaintiff as possible. Pertinently, the hyperlink for "Terms" provided on the impugned webpage "pbazaar.in" redirects to the Plaintiff's website being "policybazaar.com/legal-and-admin-policies/#termsofuse". Evidently, the said Defendant is seeking to mislead the members of the public that its purported insurance services originate from the Plaintiff.

10. It is submitted that the unauthorised and infringing use of the Plaintiff's trademarks POLICYBAZAAR, policybazaar.com, policybazaar.com, etc., on the impugned webpages constitutes infringement of the Plaintiff's well-known marks and reveals the *mala fide* intent of the Defendant No. 43 to imitate the Plaintiff and defraud innocent customers by inducing them to part with their hard-earned money in the belief that they are transacting with the Plaintiff. It is stated that the members of the public coming across Defendant No. 43's infringing webpages are bound to

presume that the Plaintiff has launched a new website and/or introduced new insurance services.

11. It is further submitted that the impugned webpage and domain name are being hosted by the said Defendant with the intent of defrauding and duping innocent customers by impersonating the Plaintiff Company and extracting money from them. Further, the use of the trademark of the insurance provider "Niva Bupa Health Insurance" on the impugned domain name "pbazaar.in" makes it abundantly clear that Defendant No. 43 is a rank infringer who through its impugned activities is seeking to derive illegal gains by trading upon the goodwill enjoyed by the Plaintiff in its well-known mark 'POLICYBAZAAR'. That the Plaintiff has received complaints against the fraudulent and illegal activities of Defendant No. 43 and there is actual confusion and harm being caused on account of the said Defendant's activities.

12. Further, on conducting a search on web.archive.org for the impugned domain name 'pbazaar.in', a version of the webpage saved on 18.12.2021 is available. However, upon accessing the same, one is automatically redirected to the website, "promotionbazaar.com", which appears to be an entity providing web designing services. It is pertinent to note that the impugned domain name "pbazaar.in" is registered in the name of one "Promotion Bazaar", which is identical to the redirected domain name "promotionbazaar.com". A relevant snapshot from web.archive.org for the impugned domain name "pbazaar.in" as saved on 18.12.2021, is reproduced herein below:



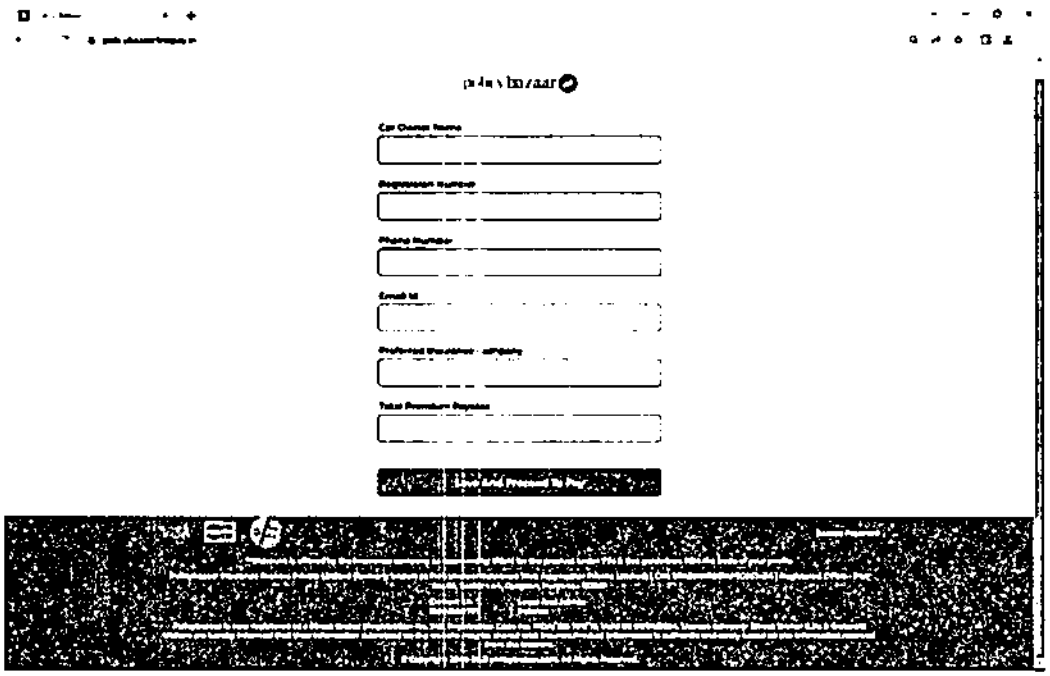
13. It is submitted that the role and involvement of "promotionbazaar.com" in enabling infringement of the Plaintiff's trademarks and copyright is currently being investigated by the Plaintiff and the Plaintiff reserves its right to implead 'promotionbazaar.com' and/or any other party depending upon the outcome of such investigation.

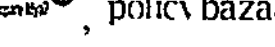
DEFENDANT NO. 44

14. The Defendant No. 44 is the Registrant of the domain name "policybazaarlinkpay.in" (*"impugned domain no. 30"*). The said Defendant, recently on 30.11.2022, obtained registration of the impugned domain name, "policybazaarlinkpay.in" which is identical/ deceptively similar to the Plaintiff's well-known trademarks POLICYBAZAAR/PAISABAZAAR and domain names Policybazaar.Com/Paisabazaar.Com. However, the details of the said Defendant No. 44 have been concealed and redacted and as such the said Defendant cannot be identified by the Plaintiff. The said domain

"policybazaarlinkpay.in" is registered with the Domain Name Registrar, Endurance Digital Domain Technology LLP (Defendant No. 10).

15. The said Defendant has deliberately and with an intention to dupe innocent customers started using the impugned webpage which features the Plaintiff's well-known mark "POLICYBAZAAR"/ " " / "policybazaar". Further, the said Defendant is also misrepresenting itself as the Plaintiff by referring to itself as "Policybazaar Insurance Brokers Private Limited", a sister concern of the Plaintiff and using the registered address and registration number of the Plaintiff on the impugned domain name. The *mala fides* of Defendant No. 47 is further evident from the fact that the impugned webpage blatantly copies the Plaintiff's copyrighted text/literary works, among other things. A relevant snapshot from the impugned webpage as on 01.12.2022 is reproduced herein below:



16. It is submitted that the unauthorised and infringing use of the Plaintiff's trademarks POLICYBAZAAR,  ,  , etc., on the impugned webpage constitutes infringement of the Plaintiff's well-known marks and reveals the *mala fide* intent of the Defendant No. 44 to imitate the Plaintiff and defraud innocent customers by inducing them to part with their hard-earned money in the belief that they are transacting with the Plaintiff. It is stated that the members of the public coming across Defendant No. 44's infringing webpage are bound to presume that the Plaintiff has launched a new website and/or introduced new insurance services.

17. It is further submitted that the impugned domain name is being hosted by the said Defendant with the intent of defrauding and duping innocent customers by impersonating the Plaintiff Company and extracting money from them. That the Plaintiff has received complaints against the fraudulent and illegal activities of Defendant No. 44 and there is actual confusion and harm being caused on account of the said Defendant's activities.

DEFENDANT NO. 45

18. The Defendant No. 45 is the Registrant of the domain name "salepolicybazaar.com" ("*impugned domain no. 31*"). The said Defendant on 20.05.2022 obtained registration of the impugned domain name, "salepolicybazaar.com" which is identical/deceptively similar to the Plaintiff's well-known trademarks POLICYBAZAAR/ PAISABAZAAR and domain names Policybazaar.Com/ Paisabazaar.Com. However, the details of the said Defendant No. 45 have been concealed and redacted through domain privacy services provided by "Domain By Proxy, LLC" and as such the said Defendant

cannot be identified by the Plaintiff. The impugned domain name has been registered with the Defendant No. 9, i.e., GoDaddy.com, LLC.

19. It is submitted that though the website hosted on the impugned domain name is inactive as on date and displays a "parked free" message from Defendant No. 9 (Domain Name Registrar), the Defendant No. 45 continues to hold the domain name registration. It is pertinent to note that the Registrants of infringing domain names such as the Defendants herein host and operate rogue websites which are activated only at intervals in order to dupe customers. That the Defendants deliberately activate the impugned domains for short durations so as to avoid detection.

20. It has further come to the Plaintiff's knowledge that the said Defendant is actively defrauding and duping innocent customers by impersonating the Plaintiff Company and issuing fraudulent communications through the email id "car@salepolicybazaar.com". The Plaintiff has requested its customers to share proof of such fraudulent communication received from Defendant No. 45 from the email id "car@salepolicybazaar.com" and is yet to receive the same. The Plaintiff reserves its rights to file additional documents in this regard as and when proof of such fraudulent communication is received by it.

21. It is thus evident that the impugned domain name and email address are being used by the said Defendant with the intent of defrauding and duping innocent customers by impersonating the Plaintiff Company and extracting money from them. That the Plaintiff has received complaints against the fraudulent and illegal activities of Defendant No. 45 by way of the use of the impugned domain name "salepolicybazaar.com" and the email address "car@salepolicybazaar.com". That there is actual confusion and harm being caused on account of the said Defendant's activities.

DEFENDANTS NO. 46 & 47

22. The Defendant No. 46 is the Registrant of the domain name "policybazaarpayment.co.in" ("*impugned domain no. 32*"). The said Defendant on 10.08.2022 obtained registration of the impugned domain name, "policybazaarpayment.co.in" which is identical/deceptively similar to the Plaintiff's well-known trademarks POLICYBAZAAR/ PAISABAZAAR and domain names Policybazaar.Com/ Paisabazaar.Com. However, the details of the said Defendant No. 46 have been concealed and redacted and as such the said Defendant cannot be identified by the Plaintiff. The impugned domain name has been registered with Defendant No. 9, i.e., GoDaddy.com, LLC.
23. The Defendant No. 47 is the Registrant of the webpage "policybazaar.payments.in" ("*impugned domain/webpage no. 33*") hosted on the domain name "payments.in". The said domain name is registered in the name of Defendant No. 47 since 16.02.2005. The said domain is registered in the name of one "India Portals", however the contact and address details of the said Defendant No. 47 have been concealed and redacted and as such the said Defendant cannot be identified by the Plaintiff. Further, the Plaintiff is unaware of when the impugned webpage was added as an extension to the domain name "payments.in". The impugned webpage uses the Plaintiff's well-known trademarks POLICYBAZAAR/PAISABAZAAR. The said domain "payments.in" is registered with the Domain Name Registrar, Endurance Digital Domain Technology LLP (Defendant No. 10).
24. It is submitted that though the impugned domain name "policybazaarpayment.co.in" of Defendant No. 46 as well as the impugned webpage "policybazaar.payments.in" and domain name "payments.in" are inactive as on date, Defendants No. 46/ 47 continue to

hold the respective domain name registrations for the same and are illegally using the Plaintiff's well-known trademarks POLICYBAZAAR/ PAISABAZAAR. It is reiterated that the Registrants of infringing domain names such as the Defendants herein host and operate rogue websites which are activated only at intervals in order to dupe customers. That the Defendants deliberately activate the impugned domains/webpages for short durations so as to avoid detection. This unauthorized and infringing use of the Plaintiff's well-known 'POLICYBAZAAR' mark reveals the *mala fide* intent of Defendants No. 46 & 47 to imitate the Plaintiff and defraud innocent customers by inducing them to part with their hard-earned money in the belief that they are transacting with the Plaintiff.

25. It is pertinent to note that vide Order dated 15.09.2022 in the present suit, this Hon'ble Court was pleased to injunct Defendants No. 31 & 32 who are the registrants of the impugned domain names, "policybazaarpayments.in" and "policybazaarpayment.in" respectively. That the impugned domain name/webpage of Defendants No. 46 & 47 being "policybazaarpayment.co.in" and "policybazaar.payments.in" are suspiciously similar to those of Defendants No. 31 & 32. In light of the above, it is likely that Defendants No. 46 & 47 are related to Defendants No. 31 & 32 and are making minor changes in the impugned domain names/webpages to avoid detection/take down.

26. It is evident that the impugned webpage and domain names are being hosted by the Defendants No. 46 & 47 with the intent of defrauding and duping innocent customers by impersonating the Plaintiff Company and extracting money from them. That the Plaintiff has received complaints against the fraudulent and illegal activities of Defendants No. 46 and 47 and there is actual confusion and harm being caused on account of the said Defendants' activities.

27. It is thus, submitted that the Defendants No. 43 - 47 are in blatant violation of the Plaintiff's exclusive rights held in the well-known trademarks POLICYBAZAAR and PAISABAZAAR. Such illegal use is being made with the sole intent to ride upon the Plaintiff's goodwill and reputation and defraud the actual and potential customers of the Plaintiff. That the Defendants No. 43 – 47 are also liable to be prosecuted for cyber fraud and other criminal offences for which the Plaintiff reserves its right to institute appropriate actions.
28. That the Defendants No. 43 – 47 neither have nor can claim to have any rights in the Plaintiff's trademarks POLICYBAZAAR and/or PAISABAZAAR. The fraudulent nature of registration & use, masking of identity and the purported offering of identical services under the Plaintiff's trademarks makes it clear that the sole intent of the said Defendants is merely to defraud the general public (including the actual and potential customers of the Plaintiff) by riding upon the hard-earned goodwill and reputation of the Plaintiff. These acts constitute infringement as well as the tort of passing off and unfair competition. Such fraudulent conduct of the said Defendants shall also inevitably lead to dilution and tarnishment of the Plaintiff's well-known marks. The said Defendants are, therefore, also liable to be injuncted in terms of the *ad-interim ex-parte* injunction granted by this Hon'ble Court vide order dated 11.11.2020.

DEFENDANTS NO. 9 AND 10

29. Defendant No. 9, GoDaddy.com, LLC is a Domain Name Registrar with which Defendants No. 43, 45 and 46 have registered their impugned domain names.

30. Defendant No. 10, Endurance Digital Domain Technology LLP, is a Domain Name Registrar, with which the impugned domain name of Defendant No. 44 and the impugned domain name/webpage of Defendant No. 47 is registered.
31. It is submitted that the said Defendants No. 9 and 10 by offering domain names/ webpages which are identical/deceptively similar to the Plaintiff's well-known mark and registered trademarks, are facilitating the fraudulent conduct of the Defendants herein along with other Defendants and several other third parties. That the Defendants No. 9 and 10 are thus, enabling the infringement and passing off of the Plaintiff's services under its trademarks POLICYBAZAAR and PAISABAZAAR.
32. Accordingly, pursuant to the *ad-interim ex-parte* injunction granted by this Hon'ble Court vide order dated 11.11.2020, the Defendants No. 9 and 10 are liable to block/suspend the infringing websites, if any, hosted by Defendants No. 43 – 47 and to maintain *status quo* in relation the impugned domain names during the pendency of this suit.

33. In light of the pleadings set out in the Plaint and the instant Application, the Plaintiff has a strong *prima facie* case in its favour and there is likelihood of the Plaintiff succeeding in its pursuit.
34. In the event that the Defendants are not prevented from continuing with the infringement of the intellectual property rights of the Plaintiff, it would cause tremendous and irreparable loss and injury to the Plaintiff which would not be possible to be compensated in terms of money alone.
35. That the balance of convenience is in favour of the Plaintiff and against the Defendants in the instant case as the Defendants shall not suffer any

loss or injury should the court temporarily pass an injunction as sought in this application, especially given that the said Defendants are passing off and infringing upon the goodwill and intellectual property rights of the Plaintiff.

PRAYER

Therefore, in view of the above, it is most respectfully prayed that this Hon'ble Court may be pleased to grant the following interim reliefs:

(a) An order of an *ex-parte* injunction restraining the Defendants No. 43 – 47, their business associates, partners, directors, principal officers, family members, servants, agents, dealers, distributors, franchisees and anyone acting for and on their behalf from using the mark/name/logo POLICYBAZAAR or PAISABAZAAR or any deceptively similar variations thereof, in any manner whatsoever, either as a part of the domain name/UPI Id/email id or a trade mark, service mark or trading style/corporate name in relation to any goods or services either on the internet or otherwise, so as to result in Infringement of Plaintiff's registered trade marks.

(b) An order of an *ex-parte* injunction restraining the Defendants No. 43 – 47, their business associates, partners, directors, principal officers, family members, servants, agents, dealers, distributors, franchisees and anyone acting for and on their behalf from using the mark/name/logo POLICYBAZAAR and PAISABAZAAR or any deceptively similar variations thereof, in any manner whatsoever, either as a part of the domain name/UPI id/email id or a trade mark, service mark or trading style/corporate name in relation to any goods or services either on the internet or otherwise, so as to result in Passing Off or any act of Unfair

Competition including resulting in confusion of any manner whatsoever.

(c) An order of *ex-parte* interim injunction restraining Defendants No. 43 – 47, its business associates, partners, directors, principal officers, family members, servants, agents, dealers, distributors, franchisees and anyone acting for and, on its behalf, from using the impugned domain names/ webpages in any manner and from transferring, alienating or offering for sale the impugned domain names to any third party and from creating any third-party interest in the impugned domain names/ webpages.

(d) An order directing Defendants No. 9 and 10 to block/suspend the website hosted on the impugned domain names/ webpages and to maintain *status quo* in relation the impugned domain names during the pendency of this suit.

(e) An order directing Defendants No. 9 and 10 to disclose the name and contact details of Defendants No. 43 – 47.

(f) An order directing Defendants No. 14 – 15 to issue a notification calling upon the various internet and telecom service providers registered under it to block access to the websites hosted by Defendants No. 43 – 47 on the impugned domain names/ webpages.

(g) Pass any other *ex parte ad interim* orders, in terms of the above;

(h) Pass any other orders as this Hon'ble Court may deem fit in the interest of justice.

KAPIL WADHWA, SURYA RAJAPPAN
& VASANTHI HARIHARAN
WADHWA LAW CHAMBERS
Advocates for the Plaintiff
DD-13 Kalkaji, LGF
New Delhi 110019
Mob: 9891929028
Email: kapil@wadhwachambers.com

Place: New Delhi.
Dated: 15.12.2022

IN THE HIGH COURT OF DELHI AT NEW DELHI
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IN
CS (COMM) NO. 471 OF 2020
CODE No. 36017

IN THE MATTER OF:
PB FINTECH LIMITED ...PLAINTIFF

VERSUS

POLICY BAZAR FINANCE & ORS. ...DEFENDANTS

AFFIDAVIT

I, Deepti Rustagi D/o Subhash Chander Rustagi aged about 44 years, Authorised Representative of the Plaintiff Company having its office at Plot No. 119, Sector – 44, Gurgaon, Haryana – 122001, presently at New Delhi, do hereby solemnly state and affirm as under:

1. That I am the Authorised Representative of the Plaintiff Company in the captioned matter and as such am well acquainted with the facts and circumstances of the present case and hence fully competent to swear the present affidavit.
2. That I have read and understood the contents of the accompanying Application and I say that the contents of the Application are true to the best of my knowledge, information and belief.

NOTARY GOVT. OF INDIA ALAKA NAYAK Advocate Reg. No. 10539 Period 27/06/2018 to 27/06/2024

PB FINTECH LIMITED

15 DEC 2022

DEPONENT

I identified the deponent who has signed in my presence.

VERIFICATION

Verified at New Delhi on this 15 day of 15 DEC 2022 that the contents of the above affidavit are true and correct to the best of my knowledge. No part of it is wrong and nothing material has been concealed therefrom.

CERTIFIED THAT Shri/Smt./Km. Deepti Rustagi S/o, W/o, D/o S. C. Rustagi identified by Kirty has solemnly affirmed before me at Delhi on 15/12/22 that the contents of this affidavit which he/she has explained to have understood are true & correct to his knowledge

PB FINTECH LIMITED

DEPONENT

NOTARY 15 DEC 2022

IN THE HIGH COURT OF DELHI AT NEW DELHI
(ORDINARY ORIGINAL CIVIL JURISDICTION)
CS (COMM) NO. 471 OF 2020
CODE NO. 36017

IN THE MATTER OF:
PB FINTECH LIMITED ...PLAINTIFF

VERSUS

POLICY BAZAR FINANCE & ORS. ...DEFENDANTS

AFFIDAVIT OF SERVICE

I, Surya Rajappan, aged 30 years, D/o Mr. Rajappan G., working at Wadhwa Law Chambers, DD-13, Kalkaji, LGF, New Delhi – 110019, do hereby solemnly affirm and declare as under:-

1. I am one of the Counsels for the Plaintiff in the above-captioned matter having the enrolment no. D/2391/2016.
2. I have effected service of the Application under Order 39 Rule 1 & 2 read with Section 151, CPC upon Defendant No. 10 at compliance@edtpl.in, Defendant No. 14 at moc-office@gov.in, Defendant No. 15 at webmaster@meity.gov.in, Defendant No. 45 at courtdisputes@godaddy.com and car@salepolicybazaar.com, and upon Defendant No. 9 through their Counsels at their email ids shweta.sahu@nishithdesai.com and godaddylitigation.nda@nishithdesai.com on 17.12.2022 at 03.28 PM.

NOTARY Debarun Behuria Advocate Regn. No. 19716 Period: 24/02/2020 to 24/02/2025 Central Delhi GOVT. OF INDIA

3. I say that the aforesaid service upon Defendant No. 9, 10, 14-15, and 45 did not bounce back and stands complete. Proof of service to the aforesaid Defendants is being annexed herewith as **Document-A**.
4. I further say that Defendants No. 43-44 and 46-47 being the Registrants of rogue websites, are not identifiable by the Plaintiff and as such no address or contact details for service are available with the Plaintiff.
5. I state that the contents of the present Affidavit are true and correct to the best of my knowledge and based upon the records available with the office.

DEPONENT

I identified the deponent who has signed in my presence.

17 DEC 2022

VERIFICATION

I, Surya Rajappan, the deponent hereinabove, do hereby verify the contents of this Affidavit to be true and correct to the best of my knowledge and belief and state that no part of this Affidavit is false and nothing material has been omitted therefrom.

Verified on this the 17 DEC 2022 day of December, 2022.

NOTARY GOVT. OF INDIA Deepanshi Dahuna Advocate Regn. No. 19716 Period 24/02/2020 to 24/02/2025 Centre - Delhi

VERIFIED THAT THE DEPONENT Smt./Sh. Surya Rajappan S/o - D/o - W/o - R/o identified by Sh./Smt. ... before me at ... has solemnly affirmed ... Delhi on 17.12.22 ... which ... That the contents ... explained to him/her ... been read & ... knowledge ... & correct ...

NOTARY

17 DEC 2022

DEPONENT

DOCUMENT-A

Gmail

Surya Rajappan <surya@wadhwachambers.com>

Service of Interim Applications in CS(Comm) 471/2020 titled "PB Fintech Pvt. Ltd. v Policy Bazar Finance & Ors." pending before the Hon'ble High Court of Delhi

Surya Rajappan <surya@wadhwachambers.com> Sat, Dec 17, 2022 at 3:28 PM
To: compliance@edtpl.in, moc-office@gov.in, webmaster@meity.gov.in, courtdisputes@godaddy.com, car@salepolicybazaar.com, shweta.sahu@nishithdesai.com, godaddylitigation.nda@nishithdesai.com
Cc: Kapil Wadhwa <kapil@wadhwachambers.com>, Vasanthi Hariharan <vasanthi@wadhwachambers.com>

Dear Sir/Ma'am,

We write to you with respect to the captioned matter wherein we represent the Plaintiff.

Kindly find attached herewith Drive links to the following documents:

1. Application under Order 1 Rule 10, CPC r/w Sec. 151, CPC seeking impleadment of Defendants No. 43 and 47 to the array of parties.

2. Application under Order 39 Rule 1 & 2, CPC r/w Sec. 151, CPC seeking interim injunction against Defendants No. 43-47 and directions against Defendants No. 9, 10, and 14-15.

Appl. under Order 1 Rule 10, CPC.pdf

Appl. under Order 39 Rules 1&2, CPC.pdf

We request you to kindly acknowledge receipt of this email.

Regards,
Surya Rajappan (Ms.)
Advocate

Wadhwa Law Chambers
DD-13, LGF, Kalkaji
New Delhi 110019
Tel: +91 11 26232344
Mob: + 91 9873595315
Email: surya@wadhwachambers.com